



**Maryland**  
Department of  
the Environment

Larry Hogan  
Governor

Boyd Rutherford  
Lieutenant Governor

Ben Grumbles  
Secretary

April 19, 2016

Mr. Shawn Garvin  
Regional Administrator  
U.S. EPA Region 3  
1650 Arch Street  
Mail Code: 3RA00  
Philadelphia, PA 19103-2029

Dear Administrator *Shawn* Garvin:

Thank you for your February 16, 2016, letter concerning air quality designations in Maryland for the 2010 1-hour sulfur dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS). The Maryland Department of the Environment (the Department) appreciates the opportunity to provide the U.S. Environmental Protection Agency (EPA) with additional technical analyses regarding the sulfur dioxide concentrations in the area of the Herbert A. Wagner Generating Station (Wagner).

The Department, in consultation with Raven Power, operator of the Wagner station, has conducted refined modeling of the 1-hour SO<sub>2</sub> emissions in the area of Wagner, and the modeling shows that the area is in attainment of the standard. In addition, the Sierra Club modeling that shows nonattainment has significant flaws. Please see the enclosed technical support document.

Sincerely,

A handwritten signature in black ink that reads "Ben Grumbles".

Ben Grumbles  
Secretary

cc: Janet McCabe  
Chet Wayland  
George S. (Tad) Aburn

Enclosures