



STATE OF NEW HAMPSHIRE
OFFICE OF THE GOVERNOR

MARGARET WOOD HASSAN
Governor

September 28, 2016

H. Curtis Spalding, Regional Administrator
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re: Designation of Attainment Area Status for New Hampshire under the Revised Ozone Standard

Dear Mr. Spalding:

In accordance with Section 107(d) of the Clean Air Act, I hereby request that New Hampshire be designated as in attainment for the 2015 8-hour primary and secondary National Ambient Air Quality Standard (NAAQS) for ozone (O₃). All areas of New Hampshire currently attain the standard and there are no areas of the state that exacerbate ozone violations in downwind nonattainment areas.

The U.S. Environmental Protection Agency (EPA) issued designation guidance in its memorandum from Janet G. McCabe to EPA Regional Administrators, dated February 25, 2015. Accordingly, my recommendation is based on quality-assured data for ozone representing the annual fourth-highest daily maximum 8-hour concentration for the years 2013-2015. No portions of New Hampshire's current monitoring network were found to exceed the 2015 ozone standard (see Table 1, attached). After review of nearby states' current ozone data (Table 2, attached), we find that these recommendations are fully compliant with Section 107(d)(1)(A) of the Clean Air Act, which defines a nonattainment area as any area that (1) does not meet the ozone NAAQS, or (2) contributes to ambient ozone violations in a nearby area.

In summary, I propose that the entire State of New Hampshire be designated as in attainment for the 8-hour ozone NAAQS. I believe there is sufficient data to support a full designation of attainment throughout the state and that a designation of unclassified is unnecessary.

Thank you for your consideration of these recommendations. If you have any questions regarding this determination, please contact Thomas Burack, Commissioner of the Department of Environmental Services, at (603) 271-3449.

With every good wish,

Margaret Wood Hassan
Governor

cc: Thomas S. Burack, Commissioner, DES
Craig Wright, Director, Air Resources Division, DES
Jeffery T. Underhill, DES
David Conroy, USEPA Region 1
Richard Burkhart, USEPA Region 1

Table 1. New Hampshire Design Values, 2013-2015 for the 2015 Ozone NAAQS

Site Name	AQS Code	4 th Highest Maximum Daily Concentration, ppm			Design Value, ppm	Ozone NAAQS ppm
		2013	2014	2015	2013-15	
Laconia	330012004	0.060	0.061	0.055	0.058	0.070
Keene	330050007	0.063	0.060	0.059	0.060	0.070
Summit Mt Washington	330074001	0.069	0.065	0.073	0.067	0.070
Mt Washington Base	330074002	0.060	0.055	0.057	0.057	0.070
Lebanon	330090010	0.061	0.062	0.054	0.059	0.070
Woodstock	330099991	0.061	0.058	0.052	0.057	0.070
Nashua-Gilson	330111011	0.068	0.063	0.061	0.064	0.070
Peterborough	330115001	0.067	0.070	0.066	0.067	0.070
Concord	330131007	0.065	0.061	0.062	0.062	0.070
Portsmouth-Peirce Island	330150014	0.066	0.068	0.065	0.066	0.070
Rye-Odiorne State Park	330150016	0.069	0.070	0.065	0.068	0.070
Londonderry-Moose Hill	330150018	0.067	0.067	0.062	0.065	0.070

USEPA AMP480_2015 data

Table 2. Design Values, 2013-2015 for the 2015 Ozone NAAQS for Counties Adjacent to New Hampshire

County	AQS Code	State	Design Value, ppm	Ozone NAAQS ppm
			2013-15	
Cumberland	230052003	Maine	0.067	0.070
Oxford	230173001	Maine	0.054	0.070
York	230310038	Maine	0.060	0.070
York	230310040	Maine	0.062	0.070
Essex	250062006	Massachusetts	0.067	0.070
Middlesex	250170009	Massachusetts	0.064	0.070
Worcester	250270015	Massachusetts	0.066	0.070
Worcester	250270024	Massachusetts	0.063	0.070

<https://www.epa.gov/air-trends/air-quality-design-values#report>

Table 3. Proposed Designations of 8-Hour Ozone NAAQS Nonattainment in New Hampshire
 NEW HAMPSHIRE – OZONE (8-HOUR STANDARD)

Designated Area	Designation	Classification
	Type	Type
New Hampshire – All portions	Attainment	