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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 15 2011

REPLY TO THE ATTENTION OF:

Bill Baumann, Acting Bureau Director
Air Bureau
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921
Madison, Wisconsin 53707-7921

Dear Mr. Baumann,

Thank you for your March 7, 2011 request for a Clean Data Determination for the 2006 24-hour Fine Particulate Matter (PM2.5) National Ambient Air Quality Standard (NAAQS) for the Milwaukee-Racine Nonattainment Area. The Region has reviewed your request and has determined that two PM2.5 monitors within the nonattainment area, which were violating the standard for 2007-2009 design value period, were erroneously approved for discontinuation at the beginning of 2010. Those monitors were the Virginia Street Fire Station PM2.5 monitor (AQS Site ID: 550790043) and the Fire Department Headquarters PM2.5 monitor on Wells Street (AQS Site ID: 550790099). The Region has, therefore, used a series of statistical tests to determine if those two monitors would likely have met the NAAQS if they had continued collecting data through 2010 for the 2008-2010 design value period.

Our analysis results show that the Virginia Street Fire Station PM2.5 monitor, had it continued operating, would very likely have shown attainment of the NAAQS. The monitor also has similar concentrations to the two remaining sites within the County of Milwaukee, which are the Wisconsin Department of Natural Resources (WDNR) Southeast Regional Headquarters PM2.5 monitor (AQS Site ID: 550790026) and the Health Center PM2.5 monitor on 16th Street (AQS Site ID: 550790010). **The Region believes that allowing this monitor to remain shut down would not compromise the requirements of 40 CFR Part 58 Appendix D.**

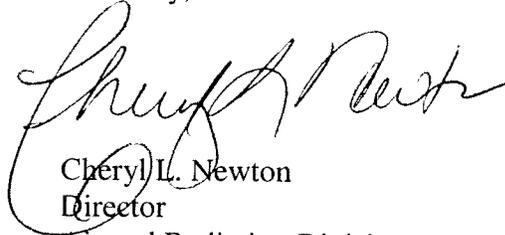
Our analysis results show that the Fire Department Headquarters PM2.5 monitor on Wells Street, had it continued operating, also would very likely have shown attainment of the NAAQS. However, this monitor appears to measure a more unique air mass than the Virginia Street Fire Station PM2.5 monitor. Additionally, people live next door to the Fire Department Headquarters PM2.5 monitor on Wells Street, which qualifies the site as population oriented and would help the nonattainment area's PM2.5 network meet the monitoring requirements of 40 CFR Part 58 Appendix D. **The Region, therefore, is requiring that the Fire Department Headquarters PM2.5 monitor on Wells Street be re-established and restart operation by January 1, 2012.**

Pursuant to your request, we intend to publish rulemaking in the Federal Register proposing to approve your Clean Data Determination request, thereby determining that the Milwaukee-Racine Nonattainment Area is meeting the 24-hour PM2.5 NAAQS. In describing our rationale for

proposing this determination, we plan to provide detailed discussion of our analysis of air quality at the discontinued monitor locations. Our final rulemaking would then reflect consideration of any public comments we receive.

If you have any questions regarding the monitoring data or statistical analysis, please contact Michael Rizzo, at 312-353-8641. If you questions regarding the PM2.5 redesignation process, please contact Gilberto Alvarez at 312-886-6143.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton". The signature is fluid and cursive, with the first name being the most prominent.

Cheryl L. Newton

Director

Air and Radiation Division

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
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March 7, 2011

Mr. John Mooney, Acting Chief of Air Programs Branch
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Mail Code: AR-18J
Chicago IL 60604

Subject: Clean Data Determination for the 2006 24-hour Fine Particulate Matter (PM_{2.5}) National Ambient Air Quality Standard (NAAQS)

Dear Mr. Mooney:

The Wisconsin Department of Natural Resources (WDNR) herby requests the U.S. Environmental Protection Agency (EPA) make a determination that the Milwaukee-Racine nonattainment area has attained the 2006 24-hour PM_{2.5} NAAQS and publish that determination in the Federal Register. This request is based on recent measured attainment statewide from Federal Reference Method (FRM) PM_{2.5} monitors from 2008 through 2010.

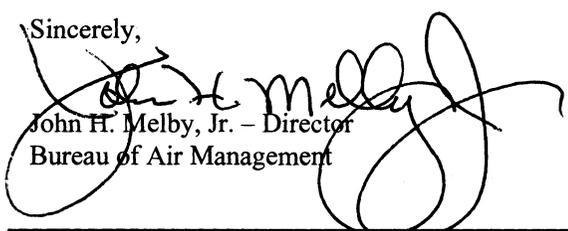
Based upon fully quality assured, quality controlled, FRM PM_{2.5} monitoring data, 98th percentile 24-hour PM_{2.5} concentrations and derived design values are presented in the attachment to this correspondence. All PM_{2.5} monitors in Wisconsin measured attainment of the 24-hour PM_{2.5} NAAQS for this period with resulting design values of 31.7 – 33.0 µg/m³ within the nonattainment area and 16.9 – 35.3 µg/m³ statewide. Notably, attainment levels have been achieved throughout the state well in advance of the December 2014 statutory deadline.

It is our understanding that a clean data determination by the U.S. EPA for the 2006 24-hour PM_{2.5} NAAQS suspends the requirement for the WDNR to submit an attainment demonstration and associated reasonably available control measures, reasonable further progress plans, contingency measures, and other planning items related to attainment of the PM_{2.5} NAAQS, in accordance with 40 CFR 51.1004. The WDNR also understands that the suspension of these planning requirements can be rescinded if the U.S. EPA subsequently issues a finding that the area is no longer attaining the NAAQS.

The measured improvements in PM_{2.5} air quality are due to a variety of state and federally enforceable control programs implemented to reduce emissions of PM_{2.5} and its precursor pollutants. The WDNR will work collaboratively with the U.S. EPA to develop a redesignation request for the Milwaukee-Racine nonattainment area over the next several months that further quantifies the achieved emission reductions.

Thank you for considering this request. If you have any questions or need additional information, please contact Joseph Hoch, Regional Pollutant and Mobile Source Section Chief, at 608-267-7543.

Sincerely,


John H. Melby, Jr. – Director
Bureau of Air Management

ATTACHMENT

Summary of PM_{2.5} Ambient Monitoring Data

All PM_{2.5} monitors in Wisconsin measured attainment of the 24-hour PM_{2.5} NAAQS for the period 2008 through 2010. During this period, the design values ranged from 31.7 – 33.0 µg/m³ within the nonattainment area and 16.9 – 35.3 µg/m³ statewide. The following table summarizes the 24-hour PM_{2.5} 98th percentile concentrations and resulting design values for the period 2008 through 2010.

Table 1. Statewide 24-Hour PM_{2.5} 98th Percentile Concentrations and Design Values from 2008 - 2010

Site Name	Site ID	POC	24-Hour 98 th -ile FRM PM _{2.5} Concentrations (µg/m ³)			Resulting Design Value ¹
			2008	2009	2010	
Green Bay	550090005	1	34.6	36.4	35.1	35.3
Appleton	550870009	1	30.5	33.5	36.6	33.5
Milw-DNR SERHQ	550790026	1	27.5	39.0	32.6	33.0
Potosi	550430009	1	35.2	33.0	30.2	32.8
Waukesha	551330027	2	29.9	32.8	35.9	32.8
Milw-16th CHC	550790010	2	27.5	39.1	30.9	32.5
LaCrosse	550630012	1	29.2	39.5	28.7	32.4
Milw-FAA/College Ave.	550790058	1	26.9	33.0	35.3	31.7
Madison	550250047	1	32.0	32.1	29.5	31.2
Perkinstown	551198001	1	33.0	25.3	32.5	30.2
Manitowoc	550710007	1	24.7	33.6	29.5	29.2
Devils Lake	551110007	1	24.4	37.8	24.9	29.0
Mayville / Horicon	550270007	1	24.7	32.3	29.9	28.9
Harrington Beach	550890009	1	26.3	31.5	27.6	28.4
Somerset	551091002	1	24.2	33.9	27.0	28.3
Chiwaukee	550590019	1	25.8	34.7	23.3	27.9
Trout Lake	551250001	1	21.2	24.5	20.9	22.2
Potawatomi	550410007	1	15.2	20.4	22.1	19.2
Bad River	550030010	1	16.0	17.6	17.3	16.9

¹ Design Values were developed in accordance with 40 CFR 50 Appendix N
Monitors located in the Milwaukee-Racine nonattainment area are identified by bold text.
FRM – Federal Reference Method

Based on this data, the WDNR believes a clean data determination for the Milwaukee-Racine nonattainment area is both reasonable and justified at this time. The WDNR will continue to operate a federally approved FRM PM_{2.5} monitoring network in this area to track continued attainment of the 2006 24-hour PM_{2.5} NAAQS.