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February 11, 2011

Susan Hedman Regional Administrator U.S. EPA Region 5 77 West Jackson Boulevard Mail Code: R-19J Chicago, IL 60604-3507

FEB 17 2011 OFFICE OF THE SECRETARY

Subject: Wisconsin Designation Recommendations for the 2010 1-hour Nitrogen Dioxide (NO₂) National Ambient Air Quality Standard (NAAQS).

Dear Administrator Hedman:

I am pleased to send this letter in compliance with section 107(d)(1)(A) of the Clean Air Act. All 72 counties in Wisconsin should be designated as attainment for the 2010 1-hour NO₂ NAAQS.

Available statewide air quality monitoring demonstrates that both rural and urban NO_2 concentrations are well below the level of the 1-hour NO_2 NAAQS and support an attainment classification. Table 1 summarizes NO_2 concentrations observed in Wisconsin since 2006.

We are aware that the U.S. Environmental Protection Agency (EPA) has established new monitoring requirements as part of the 2010 1-hour NO₂ NAAQS. The WDNR will continue to work with U.S. EPA Region 5 to evaluate and finalize the monitoring network. However, we believe that air quality designations should be based on available monitoring data. We request that the U.S. EPA wait until sufficient monitoring data is collected and implementation guidance is available before issuing attainment or nonattainment designations for future air quality standards.

Thank you for the opportunity to submit the State of Wisconsin's recommendation on this important air quality matter. If you have any questions or need additional information, please feel/free to contact WDNR Air Management Bureau Director John Melby at 608-264-8884.

Sincerely, Scott Walke Governor

cc: Cathy Stepp, Secretary, WDNR

TABLE 1: WISCONSIN NO2 MONITORING DATA

| Location | Parameter | 2006 | 2007 | 2008 | 2009 | 2010 ¹ |
|----------------------------|------------------------------|----------------|--------|--------|----------------|-------------------|
| Ashland, WI | 98 th %-ile Conc. | - | - | - | • | 16 ppb |
| | Design Value | • • | • | - | - | - |
| Cassville, WI | 98 th %-ile Conc. | - ¹ | • | - | | 29 ppb |
| | Design Value | • | - | | ⁻ - | |
| Manitowoc, WI ² | 98 th %-ile Conc. | 15 ppb | 11 ppb | 15 ppb | 9 ppb | 31 ppb |
| | Design Value | | - | 13 ppb | 11 ppb | 18 ppb |
| Milwaukee, WI | 98 th %-ile Conc. | 48 ppb | 50 ppb | 44 ppb | 49 ppb | 70 ppb |
| | Design Value | - | - | 47 ppb | 47 ppb | 54 ppb |
| Potawatomi, WI | 98 th %-ile Conc. | - | | | - | 5 ppb |
| | Design Value | - | - | - | - | - |

¹ This data is from January - October 28.
 ² This monitor only operates from June 1 – August 31.