



Office of the Village Administrator
Michael R. Pollocoff

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AIR MANAGEMENT

March 22, 2013

VIA Email and U.S. Mail

Gail Good
c/o Air Monitoring Section
Bureau of Air Management
P.O. Box 7921
Madison, WI 53707

Re: Additional Air Quality Monitoring in Kenosha County

Dear Ms. Good,

Thank you for the opportunity to submit comments on the DNR's proposal to place a second air monitor in Kenosha County. As you know, the concept of an additional monitor was first discussed prior to EPA's finalization of the nonattainment areas. The idea for an additional monitor was to further support the basis of a partial county designation and that there is a significant decline in ozone levels as one travels away from the lakeshore. The EPA did, in fact, finalize a partial county designation on this basis. Because the partial designation has been accepted by the EPA, the Village sees no need to provide for further monitoring.

If the DNR does move forward with an additional monitor, the Village strongly supports establishing the monitor as a special purpose monitor. The special purpose monitor will provide the data but is not a permanent monitor subject to the federal requirements for removing or relocating a monitor as is the Chiswaukee monitor. A suitable location for the special purpose monitor may be at Green Bay Road on the Big Oaks Golf Course.

If you have any questions, please feel free to contact me or Marney Hoefer at (608) 259-2685.

Sincerely,

Michael Pollocoff

**KEITH G. BOSMAN
MAYOR**



*CITY OF KENOSHA
625 - 52nd Street
Kenosha, Wisconsin 53140
(262) 653-4000
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March 22, 2013

VIA E-MAIL GAIL.GOOD@WISCONSIN.GOV AND U.S. MAIL

Gail Good
Department of Natural Resources
PO Box 7921
Madison WI 53707-7921

RE: City of Kenosha

Dear Ms. Good:

Kenosha County, the City of Kenosha, the Kenosha Area Business Alliance, and the Southeastern Wisconsin Regional Planning Commission ("Commenters") appreciate this opportunity to provide comments in support of WDNR's proposal to install a second ozone monitor in Kenosha County. The Commenters believe that a second monitor would provide valuable data for WDNR and U.S. EPA in evaluating ozone levels in the County and determining appropriate steps to address any ozone issues.

Of course, ozone measurement carries significant regulatory and economic consequences. Improved air quality is inarguably beneficial to the Commenters and the entire region. At the same time, non-attainment designations can have a substantial impact on local economic development. Thus, in order to promote both air quality and local economic growth, regulatory decisions must be based on the most accurate and thorough data possible.

Currently, the only ozone monitor in Kenosha County is the Chiwaukee Prairie Monitor, located in the far southeastern corner of the County, very near the Illinois border and Lake Michigan. The Chiwaukee Prairie Monitor is likely not representative of ozone levels throughout the County, as its proximity to Lake Michigan and the Chicago metropolitan area result in elevated ozone readings. Past data support this common-sense observation; ozone levels measured at the former Parkside and Barbershop monitors were consistently and significantly lower than those measured at Chiwaukee. See Exhibit A.

A second monitor will provide a more accurate picture of ozone levels in Kenosha County, as compared to exclusive reliance on the existing Chiwaukee Prairie Monitor. A monitor to the north and west of Chiwaukee (i.e., farther from Lake Michigan and from Chicago-area ozone sources) will generate useful information about air quality in different parts of the County and provide a better indication of the relative impact of Chicago-area sources versus local sources on

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Kenosha County's air quality. EPA's current regulatory approach in Kenosha County – splitting the County into attainment and non-attainment portions – validates the need for data from different areas. In addition, data from a second monitor could also help counter the negative perception of local air quality caused by the high Chiwaukee ozone measurements, thereby encouraging residents and businesses to remain in or relocate to Kenosha County.

The Commenters' understanding is that this second monitor would be designated a Special Purpose Monitor pursuant to 40 CFR § 58.20. As a Special Purpose Monitor, the second monitor could be discontinued within two years after startup if WDNR determines that the data is not useful. In addition, the Special Purpose Monitor could not be used as the basis for a NAAQS non-attainment determination, unless it is operated for more than two years.

The Commenters understand that WDNR is considering placing the second monitor on utility property in the vicinity of Route 31. The Commenters believe this is a sensible proposal. This location is far enough from Lake Michigan and from Illinois to lessen the impact of the lake and Chicago-area sources on ozone levels, and it would provide valuable information on ozone levels in the populous eastern part of the County.

Very truly yours,

CITY OF KENOSHA



Keith Bosman
Mayor

KENOSHA COUNTY



Jim Kreuser
County Executive

SOUTHEAST WISCONSIN
REGIONAL PLANNING



Ken Yunker
Executive Director

KENOSHA AREA BUSINESS ALLIANCE



Todd Battle
President

I feel a second station is needed away from Chiwaukee Prairie at an inland site to show gradient but far enough from I-94 to be meaningful . Also, SE.Wisconsin has suffered long enough from polluted air migrated along Lake Michigan from Illinois,Indiana and Ohio. Thank you for your consideration.

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