



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

REPLY TO THE ATTENTION OF:

Loretta Lehrman  
77 W. Jackson Blvd  
Chicago IL 60604

July 25, 2012

Bart Sponseller  
Director  
Bureau of Air Management  
Wisconsin Department of Environmental Resources  
101 S. Webster Street  
Box 7921  
Madison, WI, 53707-7921

Dear Mr. Sponseller,

This is the initial response from US EPA Region 5, Air and Radiation Division to the document sent by Wisconsin DNR Bureau of Air Management on July 11, 2012 titled "Documentation in Support of a Request to Designate the PM<sub>2.5</sub> Episode of Eastern Wisconsin September 13-14, 2011 As an Exceptional Event." We are requesting that the Bureau of Air Management resubmit the document with the following changes and additional information.

1. For each value to be evaluated by EPA list the monitor ID, date, time and appropriate NAAQS. Both the PM<sub>2.5</sub> Annual and 24-hour NAAQS might apply to these values. Any exceeding value for any FRM or FEM monitor will be used for attainment decisions regardless of the monitor type, e.g. "SLAMS," so it is recommended that WDNR attempt to demonstrate that any appropriate violating values from these monitors were caused by the event.
2. For each value quantify how much of that value was due to the event and demonstrate that but for the contribution from the event the value would not violate or contribute to a violation of the NAAQS. Section 5.4 of the document does not cover this with enough detail to meet the quantitative requirement of the CFR.
3. For each value demonstrate a clear causal connection between that value and the event. It is not enough to show that other monitors in the state were affected by the event, or that the event occurred on the same day. For example the event might have affected monitors in one area of the state but not contributed to violations at other nearby monitors.

4. For each monitor with an exceptional value demonstrate that the values observed during the event are in excess of normal historical fluctuations.  
§40 CFR 50.14 (c)(3)(iv)(C) states there must be evidence that “The event is associated with a measured concentration in excess of normal historical fluctuations, including background.” In section 5.3 of the document this is demonstrated with monitors that do not use FRM or FEM methods and values from these monitors are not being requested to be excluded. Values at the FRM/FEM monitors that are being requested to be excluded might fall within normal ranges even though other monitors in the state are reading abnormally high values. This may be demonstrated using percentiles and historical seasonal variations.
5. Ensure that all dates and times are listed correctly for their time zone. Dates and times do not match between Figure 1, Table 1, Figure 15, Figure 16 and the narrative. This is due in part to using both CDT and CST time zones, but the days of the violations also do not match.
6. Submit evidence that the public review process was followed and include any comments from the public.  
§40 CFR 50.14 (c)(3)(i) states “A State must submit the public comments it received along with its demonstration to EPA.” §40 CFR 50.14 (c)(3)(v) states “With the submission of the demonstration, the State must document that the public comment process was followed.”

If you have any questions regarding this request please contact Jesse McGrath (mcgrath.jesse@epa.gov, 312-886-1532)

Sincerely



Loretta Lehrman, Chief  
Air Monitoring and Analysis Section

cc: George Czerniak — US EPA Region 5 — electronic  
Michael Rizzo — US EPA Region 5 — electronic  
Patricia Schraufnagel — US EPA Region 5 — electronic  
Jesse McGrath — US EPA Region 5 — electronic  
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Jason Treutel — AM/7 — electronic  
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Grant Hetherington — AM/7 — electronic

encl: none