



June 29, 2012

Air Docket, U.S. Environmental Protection Agency (EPA)
Mail Code 6102T, 1200 Pennsylvania Ave., NW
Washington, DC 20460
Attn: Docket ID No. EPA-HQ-OAR-2010-1059

Subject: Supplemental Comments on EPA's 1-Hour Sulfur Dioxide (SO₂) White Paper

Dear Administrator Jackson:

The Wisconsin Department of Natural Resources (WDNR) hereby submits comments on EPA's 1-hour SO₂ National Ambient Air Quality Standard (NAAQS) implementation white paper. These comments are intended to supplement the comments submitted by the Lake Michigan Air Directors Consortium (LADCO). Thank you for the opportunity to comment and reaching out to stakeholders to develop an implementation strategy for SO₂.

Monitoring Strategy: EPA has been suggesting that 2 – 3 monitors may be needed per source to determine compliance with the SO₂ NAAQS through monitoring. Given that monitors would be in place for a minimum of 7 to 8 years, in accordance with 40 CFR Part 58.14(c)(2), which states the following shutdown criteria:

“Any PM_{2.5}, O₃, CO, PM₁₀, SO₂, Pb, or NO₂ SLAMS monitor which has shown attainment during the previous five years, that has a probability of less than 10 percent of exceeding 80 percent of the applicable NAAQS during the next three years based on the levels, trends, and variability observed in the past, and which is not specifically required by an attainment plan or maintenance plan.”

EPA should let sources install 1 monitor in the predicted maximum concentration area consistent with the approach taken on the lead (Pb) NAAQS. If the monitor demonstrates attainment after 3 years, the source should be allowed to decommission the monitor. This approach would require EPA to modify the current 40 CFR Part 58 language. At a minimum, EPA should look to provide flexibility for sources willing to conduct monitoring. It makes no sense to require monitors to operate for at least 7 years or more if they continuously meet the NAAQS.

SIP Conditions: If modeling is used to resolve potential nonattainment rather than monitoring, only the key input parameters (e.g., emission rate, stack height, diameter and orientation) should be included as SIP conditions. Given the time it takes to get SIP changes approved, having all of the modeling inputs, such as building dimensions, become SIP conditions would be unnecessary and overly burdensome.

Please contact Joseph Hoch of my staff at (608) 267 – 7543 or Joseph.Hoch@wisconsin.gov if you have any questions concerning our comments.

Sincerely,

Bart Sponseller
Bureau of Air Management – Director
Wisconsin Department of Natural Resources