



January 13, 2017

Mr. Robert A. Kaplan  
Acting Regional Administrator  
U.S. Environmental Protection Agency – Region V  
77 West Jackson Boulevard  
Mail Code: R-19J  
Chicago, IL 60604-3507

SUBJECT: Updated Designation Recommendations for the 2010 1-hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS)

Dear Acting Regional Administrator Kaplan:

This letter is to provide the U.S. Environmental Protection Agency (EPA) with updated recommendations for EPA's next round of designations for the 2010 SO<sub>2</sub> NAAQS.

EPA is designating areas for this NAAQS in four rounds. In the two rounds that have been completed, EPA made the following designations in Wisconsin:

- The Rhinelander (partial Oneida County) area was designated “nonattainment” on July 25, 2013 as part of the initial round of designations.<sup>1</sup>
- Columbia County was designated “unclassifiable/attainment” on July 12, 2016 as part of Round 2 designations.

By December 31, 2017, EPA intends to designate all remaining areas of the country, with the exception of those areas conducting monitoring in accordance with the SO<sub>2</sub> NAAQS Data Requirements Rule (DRR). EPA invited states to submit, by January 13, 2017, updated recommendations for EPA to consider when making these “Round 3” designations.<sup>2</sup>

#### Recommendation for all remaining areas of Wisconsin

On behalf of Governor Scott Walker, the Wisconsin Department of Natural Resources (WDNR) recommends that EPA designate, in Round 3, all remaining areas in Wisconsin as “attainment” of the 2010 SO<sub>2</sub> NAAQS. It is understood that, where there are areas conducting air quality monitoring in accordance with the DRR, EPA may not be able to designate those specific areas at this time.<sup>3</sup> EPA should attempt to constrain any undesignated areas to as small a boundary as possible.

<sup>1</sup> Wisconsin submitted the required attainment SIP for this area on January 22, 2016. EPA found this submittal complete on February 25, 2016.

<sup>2</sup> See EPA's July 22, 2016 memo “Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard – Round 3.”

<sup>3</sup> Wisconsin is overseeing monitoring in one such area, around the Expera Specialty Solutions, LLC-Kaukauna facility in Outagamie County.

EPA's SO<sub>2</sub> area designations guidance describes several factors to consider when identifying attainment areas and determining the appropriate attainment area boundaries. WDNR considered these factors in support of this recommendation, as follows:

- Ambient monitoring data. EPA's designations guidance describes that an area may be demonstrated in attainment if the most recent three years of ambient air quality monitoring data indicate no violations. From 2014-2016, WDNR operated six SO<sub>2</sub> monitors as part of its EPA-approved statewide monitoring plan. The preliminary 2014-2016 design values for five of the six monitors are as follows:<sup>4</sup>

Monitor Site	County	Preliminary 2014-2016 Design Value (ppb)
Green Bay – East High	Brown	54
Madison – East	Dane	4
Horicon Wildlife Area	Dodge	4
Potawatomi	Forest	6
Milwaukee – SER DNR Headquarters	Milwaukee	15

Based on the latest data, these monitors all reflect attainment of the 2010 SO<sub>2</sub> NAAQS (75 ppb).

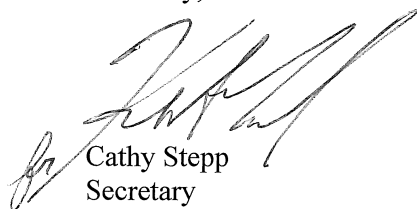
- Dispersion modeling results. To comply with DRR, WDNR modeled certain sources in accordance with the dispersion modeling protocols submitted to EPA on July 1, 2016 and modified, as appropriate, based on EPA review. The results of the modeling, which have been submitted to EPA separately, show that these areas will meet the 2010 SO<sub>2</sub> NAAQS.
- Emissions-related data. WDNR has appropriately considered statewide SO<sub>2</sub> emissions by considering and addressing specific source emissions through implementation of the DRR, including completing any required dispersion modeling, installing air quality monitors, and ensuring sources have taken appropriate emission limits or closed down.
- Meteorology, geography, and topography. These factors were fully considered in the air dispersion modeling required under the DRR and are described in more detail in the analyses submitted by WDNR to EPA. There are otherwise no specific features or factors that need to be considered for designation purposes.
- Jurisdictional boundaries. When considering boundaries, WDNR recommends that EPA designate all remaining areas in Wisconsin as “attainment” of the 2010 SO<sub>2</sub> NAAQS. It is understood that, where there are areas conducting air quality monitoring in accordance with the DRR, EPA may not be able to designate those specific areas at this time.

EPA has stated that the air quality data developed by air agencies pursuant to the DRR may be used by the EPA in future actions to evaluate areas' air quality under the 2010 SO<sub>2</sub> NAAQS, including area designations. In consultation with EPA, Wisconsin has fully implemented this rule, including completing all modeling and monitoring requirements needed to evaluate SO<sub>2</sub> emissions from sources within the state. Based on this, as well as consideration of the latest air quality monitoring data and the other factors described in EPA guidance, the recommendations in this letter are fully supported.

<sup>4</sup> In 2013, EPA designated part of Oneida County as nonattainment based on 2009-2011 data from the Rhinelander SO<sub>2</sub> monitor. Data from this monitor is therefore not included in the table.

If you have any questions about this letter or require additional information, please contact Gail Good, WDNR Air Program Director at [Gail.Good@wisconsin.gov](mailto:Gail.Good@wisconsin.gov) or (608) 264-8537.

Sincerely,



Cathy Stepp  
Secretary

cc: Pat Stevens  
Bart Sponseller  
Gail Good  
David Bizot