



October 5, 2017

Mr. Robert A. Kaplan  
 Acting Regional Administrator  
 U.S. Environmental Protection Agency – Region V  
 77 West Jackson Boulevard  
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SUBJECT: EPA’s Intended Designations for the 2010 1-hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS) in Wisconsin

Dear Acting Regional Administrator Kaplan:

This letter responds to the U.S. Environmental Protection Agency’s (EPA’s) intended designations for certain areas in Wisconsin for the 2010 SO<sub>2</sub> NAAQS. EPA is required to complete designations for this NAAQS by December 31, 2017 for all remaining undesignated areas of the country, with the exception of areas that began newly monitoring for SO<sub>2</sub> in order to meet requirements of the SO<sub>2</sub> Data Requirements Rule (DRR). In its August 22, 2017 letter to Governor Walker, EPA proposed designating all remaining areas of Wisconsin as unclassifiable/attainment for this NAAQS, with the exception of Walworth and Outagamie counties.

EPA’s designation guidance describes that an area may be designated as attainment if the most recent three years of ambient air quality monitoring data indicate no violations. The Wisconsin Department of Natural Resources (WDNR) has followed EPA guidance to ensure that air quality monitors are appropriately sited to measure ambient SO<sub>2</sub> concentrations. Therefore, WDNR recommends that the following counties in Wisconsin be designated as “attainment” of the 2010 SO<sub>2</sub> NAAQS, rather than “unclassifiable/attainment,” based on 2014-2016 design values that show attainment of the NAAQS:

Monitor Site	County	2014-2016 Design Value (ppb)
Green Bay – East High	Brown	54
Madison – East	Dane	5
Horicon Wildlife Area	Dodge	4
Potawatomi	Forest	6
Milwaukee – SER DNR Headquarters	Milwaukee	15

EPA’s intention to designate remaining area of the state as unclassifiable/attainment is sensible because such a designation is supported by the actions taken by the state and affected facilities to characterize and address the SO<sub>2</sub> air quality around sources listed under the DRR. The actions taken by the state to meet the requirements of the DRR necessitated tremendous time and effort and were largely unfunded by EPA.


EPA noted in its August 22, 2017 letter that it anticipates designating Walworth County as unclassifiable/attainment in its final action in December, based on implementation of recently approved requirements for USG-Walworth (82 FR 31458) that contain a compliance date of October 1, 2017. Since state modeling based on the requirements in Wisconsin Administrative Order AM-16-01 indicates the NAAQS is met

in the area around the facility, EPA should ensure that Walworth County is designated as unclassifiable/attainment in December 2017.

EPA plans to designate Outagamie County no later than December 31, 2020, due to a new SO<sub>2</sub> monitoring network in this area established to comply with the DRR. EPA should attempt to constrain any undesignated area in Outagamie County to as small of a boundary possible. EPA should also designate this area as attainment in a timely manner, should monitoring data support such a designation.

This letter has also been submitted to EPA docket ID # EPA-HQ-OAR-2017-0003. If you have any questions or require additional information, please contact David Bizot at [David.Bizot@wisconsin.gov](mailto:David.Bizot@wisconsin.gov) or (608) 267-7543.

Sincerely,



Gail Good  
Director  
Air Management Program

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