

**State of Wisconsin**  
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**Tony Evers, Governor**  
**Preston D. Cole, Secretary**  
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May 1, 2020

Mr. Kurt Thiede  
U.S. Environmental Protection Agency - Region 5  
77 West Jackson Boulevard  
Mail Code: R-19J  
Chicago, IL 60604-3507

**SUBJECT:** Updated Recommendation for Round 4 Designations for the 2010 1-hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS)

Dear Regional Administrator Thiede:

This letter is to provide the U.S. Environmental Protection Agency (EPA) with an updated recommendation for EPA's Round 4 designations for the 2010 1-hour SO<sub>2</sub> NAAQS.

EPA is designating areas for this NAAQS in four rounds. In the three 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>
- The remainder of Wisconsin, with the exception of Outagamie County, was designated as "attainment/unclassifiable" in EPA's Round 2 and Round 3 designations, completed July 12, 2016 and January 9, 2018.

By court order, EPA must complete the Round 4 designations no later than December 31, 2020. EPA invited states to submit, by May 1, 2020, updated recommendations for EPA to consider when making this final round of designations.<sup>2</sup> Wisconsin's one remaining area that has not been initially designated for this NAAQS, and therefore will be designated by EPA in Round 4, is Outagamie County.

#### Recommendation of nonattainment for Outagamie County

On behalf of Governor Tony Evers, the Wisconsin Department of Natural Resources (WDNR) recommends that EPA designate Outagamie County as "nonattainment" of the 2010 SO<sub>2</sub>

<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 September 6, 2019 memo "Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard – Round 4."

NAAQS. This recommendation is based upon the factors included in EPA's guidance that states should consider when identifying nonattainment areas and determining the appropriate area boundaries. WDNR considered these factors in support of this recommendation, as follows:

- Ambient monitoring data. To comply with the SO<sub>2</sub> Data Requirements Rule (DRR), a new ambient air quality monitor was installed and operated in this area beginning in January 2017. EPA's guidance states that available SO<sub>2</sub> monitoring data from 2017-2019 should be reviewed when developing a Round 4 designation recommendation. Based on quality-assured and certified monitoring data from the Outagamie County SO<sub>2</sub> monitor (AQS Site ID 55-087-0015), the 2017-2019 design value for this area is 77 ppb. This figure exceeds the 2010 SO<sub>2</sub> NAAQS of 75 ppb.
- Emissions-related data. EPA's guidance indicates that states should review, at a minimum, the three most recent years of emissions data from sources located in the area. The following table summarizes the SO<sub>2</sub> emissions sources in the Outagamie County and includes the most recent three years of emissions data. The predominate SO<sub>2</sub> source in the county is the Ahlstrom-Munksjo Specialty Solutions paper mill located in Kaukauna, which is the DRR-listed source in this area.<sup>3</sup>

Facility Name	FID	SO <sub>2</sub> emissions (tons per year)		
		2017	2018	2019
OUTAGAMIE COUNTY LANDFILL	445012370	13.63	8.76	22.88
AHLSTROM-MUNKSJO NA SPECIALTY SOLUTIONS, LLC	445031180	5997.21	6324.95	4897.68
APPLETON PROPERTY VENTURES, LLC (D.B.A. MIDWEST PAPER GROUP)	445031290	68.36	1.54	2.91
WISCONSIN PUBLIC SERVICE CORPORATION - FOX ENERGY CENTER	445159110	6.02	6.92	8.33
OUTAGAMIE CLEAN ENERGY PROJECT LLC	445172420	15.54	15.30	14.05
	TOTAL	6100.76	6357.47	4945.85

- Meteorology, geography, and topography. There are no specific factors related to weather or physical features that need to be considered for designation purposes.
- Jurisdictional boundaries. When defining a nonattainment area, EPA recommends states consider existing jurisdictional boundaries for the purposes of providing a clearly defined legal boundary for carrying out the air quality planning and enforcement functions for the

<sup>3</sup> This facility (FID 445031180) was previously owned by Expera Specialty Solutions. This facility was one of the sources identified by Wisconsin as requiring further characterization under the DRR in the state's required submittal to EPA on January 15, 2016 and identified to EPA as using ambient monitoring for this characterization on January 13, 2017.

area. In the case of this designation, the jurisdictional boundary of Outagamie County is recommended.

Based on consideration of the latest air quality monitoring data and the other factors described in EPA guidance, a recommendation of nonattainment for Outagamie County, Wisconsin is supported.

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,

DocuSigned by:  
  
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Preston D. Cole  
Secretary

cc: Darsi Foss (EM/8)  
Bart Sponseller (EM/7)  
Gail Good (AM/7)  
David Bizot (AM/7)