SCOTT WALKER
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STATE OF WISCONSIN

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May 26, 2011

Ms. Susan Hedman
U.S. Environmental Protection Agency (EPA) Region 5 Administrator
77 West Jackson Boulevard
Mail Code: R-19J
Chicago, IL 60604-3507

Subject: Wisconsin Designation Recommendations for the 1-Hour Sulfur Dioxide (SO_2) National Ambient Air Quality Standard (NAAQS)

Dear Ms. Hedman,

I am pleased to send this letter in compliance with Section 107(d)(1)(A) of the Clean Air Act. The state of Wisconsin recommends the following designations for the 1-hour SO_2 NAAQS:

- Nonattainment for a portion of Oneida County, including the City of Rhinelander and the Towns of Crescent, Newbold, Pine Lake and Pelican, attainment for the remainder of Oneida County and unclassifiable for all other Wisconsin Counties.

The technical dispersion modeling analysis supporting a smaller nonattainment area, rather than the U.S. EPA default county boundary designation, is enclosed for your review.

It should be noted that only one monitor in the current Wisconsin SO_2 monitoring network reports concentrations above the 1-hour SO_2 NAAQS. Wisconsin anticipates that SO_2 monitoring data will continue to demonstrate attainment in the future as new federal regulations are implemented.

The Wisconsin Department of Natural Resources (WDNR) is currently working collaboratively with a facility in Rhinelander, Wisconsin to reduce the high SO_2 concentrations being monitored. The State of Wisconsin may revise these designation recommendations contained herein pending the results of this ongoing effort.

The State of Wisconsin also strongly recommends that the U.S. EPA issue implementation guidance for the new 1-hour SO_2 NAAQS as expeditiously as practicable. In addition, the U.S. EPA should issue implementation guidance concurrently with the promulgation of any new or revised air quality standards in the future.

Thank you for the opportunity to submit the State of Wisconsin's recommendation for this important air quality matter. If you have any questions or require additional information, please feel free to contact John H. Melby, Jr., WDNR Air Management Bureau Director, at (608) 264-8884 or John.MelbyJr@wisconsin.gov.

Sincerely,

Scott Walker
Governor

cc: Cathy Stepp – DNR Secretary
Attach: (1) Wausau Paper Mills, LLC Geographic Modeling Analysis