



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 31 2014

REPLY TO THE ATTENTION OF:

Ms. Gail Good, Supervisor
Air Quality Monitoring
Bureau of Air
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI
53707-7921

Gail
Dear Ms. Good:

The United States Environmental Protection Agency (EPA) has reviewed the 'Wisconsin Department of Natural Resources/Air Monitoring Network Plan 2015.' EPA appreciates the summary of significant changes to the monitoring network included in the plan, it is helpful in the review of the document.

EPA agrees that WDNR may reduce the sampling frequency from every day to once each three days for the following PM_{2.5} FRMs: Madison, University Avenue (AQS 55-025-0047); Appleton (AQS 55-087-0009) and Green Bay East (AQS 55-009-0005). The (2011-2013) PM_{2.5} daily design values for the Madison monitor and Appleton monitor were 23 ug/m³ and for the Green Bay monitor the daily design value was 24 ug/m³. Only PM_{2.5} monitors with design values within five percent of the National Air Quality Standard (NAAQS) must do daily sampling.

It is unfortunate that the building where the ozone monitor on Washington Avenue in Racine (AQS 55-101-0017) is no longer safe to enter. EPA agrees the proposed location of 4227 Charles Street in the Village of Caledonia is an acceptable replacement location as specified in your September 22, 2014 letter. EPA believes that both the Washington Avenue, Racine site and the Charles Street, Caledonia site would produce similar peak ozone concentrations on high ozone days. Because the Caledonia site is near a quarry, WDNR must take care that the impact of particulate emissions from the quarries immediately upwind of the new monitoring site will not interfere with the ozone monitoring at the new site. The new site must be operational at the beginning of the 2015 ozone season.

Due to increased analysis costs and possible funding cuts, EPA determined the PM_{2.5} speciation network would have to be reduced. In Wisconsin, the Waukesha site will no longer be funded.

EPA Region 5 is altering our existing waiver system. For many years Region 5 issued waivers with no periodic reassessment, only the recent lead waivers were issued with a mandatory review date. In 2015 EPA Region 5 would like to review all waivers issued without a mandatory review

date. EPA Region 5 requests that WDNR submit any waivers (without a mandatory review date) that it would like to keep in effect and the Region will reconsider them.

EPA has proposed several new rules which may affect WDNR's monitoring network. On May 13, 2014 EPA proposed data requirement rules to characterize the air quality near large SO₂ sources for the one hour SO₂ primary NAAQS. The characterization could be accomplished by either modeling the source or providing monitoring data. The document can be found at <http://www.gpo.gov/fdsys/pkg/FR-2014-05-13/pdf/2014-09458.pdf> On September 11, 2014 EPA proposed revisions to ambient air monitoring requirements for criteria pollutants. The proposed changes include special purpose monitoring and quality assurance requirements. The document can be found at <http://www.gpo.gov/fdsys/pkg/FR-2014-09-11/pdf/2014-19758.pdf> Please be aware of any changes in the monitoring requirements which may occur as a result of these proposals.

EPA appreciates the effort made by WDNR to construct the new Milwaukee Near Road site. The site became operational by the January 1, 2014 required start date.

If you have questions concerning this letter please contact Patricia Schraufnagel at 312-886-5955.

Sincerely,

A handwritten signature in black ink, appearing to read "Loretta Lehman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Loretta Lehman, Manager
Air Monitoring and Analysis Section