



August 26, 2011

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

Subject: Comments Regarding Wisconsin's Proposed Nitrogen Dioxide (NO₂) National Ambient Air Quality Standard (NAAQS) Designations

Dear Ms. Hedman:

The purpose of this letter is to provide comments on your June 28, 2011 letter to Governor Scott Walker regarding the U.S. EPA's proposed designations for the recently revised primary NO₂ NAAQS for the State of Wisconsin.

First, thank you for recognizing that all of our existing NO₂ monitors have demonstrated and continue to demonstrate compliance with the revised NO₂ air quality standard by proposing to designate the entire state as "unclassifiable / attainment". While we would prefer a designation of "attainment" only for clarity purposes, we recognize that this is the best designation (i.e., indicative of cleanest air) available at this time.

Second, we recommend that the U.S. EPA use the seventy-two (72) Wisconsin county borders to define distinct and separate unclassifiable / attainment areas rather than the entire state as one unclassifiable / attainment area. This approach will help the state better address and manage potential impacts of the NO₂ NAAQS on our air permitting program. It is our understanding that using county borders for this purpose does not preclude the agency from recommending other size areas in the event that monitoring data shows exceedances of the NO₂ NAAQS in the future.

Thank you for your continued collaborative effort regarding important air quality matters. If you have any questions, please call me at (608) 267 – 7556 or your staff may contact William B. Baumann, Acting Air Management Bureau Director, at (608) 267 – 7542 or william.baumann@wisconsin.gov.

Sincerely,

Cathy Stepp – Secretary
Wisconsin Department of Natural Resources

cc: Cheryl L. Newton, U.S. EPA Region 5 Air Division Director (A-18J)
Pat Stevens, Air and Waste Division Administrator (AD/8)
William B. Baumann, Acting Air Management Bureau Director (AM/7)