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October 15, 2020

Mr. Kurt Thiede
U.S. Environmental Protection Agency - Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

Attention: Docket ID# EPA-HQ-OAR-2020-0037

Subject: Response to EPA's Intended Designation for Outagamie County for the 2010 1-hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS), Docket ID# EPA-HQ-OAR-2020-0037

Dear Regional Administrator Thiede:

On August 13, 2020, the U.S. Environmental Protection Agency (EPA) notified Wisconsin that it intended to designate most of Outagamie County¹ as nonattainment of the 2010 SO₂ NAAQS by December 20, 2020, as part of its fourth and final round of designations for this standard. As was noted in the letter, EPA's intended action was consistent with Wisconsin's recommendations and designations-related information that was submitted to EPA on May 26, 2011, May 1, 2020, and July 17, 2020.

Wisconsin's recommendation of nonattainment for this area, as well as EPA's intended designation, was based primarily on 2017-2019 data from the Kaukauna monitor in Outagamie County (Site ID #550870015). This data indicates a three-year design value of 77 ppb, which exceeds the 2010 SO₂ NAAQS of 75 ppb.

SO₂ concentrations measured at the Kaukauna monitor have decreased since 2018. As a result, the preliminary 2018-2020 design value at that monitor (through September 30, 2020) is 63 ppb. Should final, quality-assured data from this monitor at the end of 2020 show a 2018-2020 design value that meets the NAAQS, it is the request of the Wisconsin Department of Natural Resources that EPA make a timely clean data determination for this area. This would appropriately recognize that the air quality in the area has reached attainment levels and potentially make finalization of a nonattainment designation unnecessary. It would be Wisconsin's intention to early certify the 2020 data in time to support this determination by EPA. The state would not be providing accompanying modeling, since the ambient air monitoring data is from a SO₂ Data Requirements Rule source-oriented monitor located in the area of highest concentration.

¹ EPA's intended nonattainment designation includes all of Outagamie County, except Oneida Township (which includes Oneida Reservation), Oneida Off-Reservation Trust Land, and noncontiguous portions of Seymour Township adjoining the Oneida Nation Tribal Lands.

If you have any questions about these comments, please contact David Bizot at David.Bizot@wisconsin.gov.

Sincerely,

DocuSigned by:
Gail E. Good
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10/14/2020 | 12:44 PM CDT

Gail Good
Director
Air Management

cc: Preston Cole, Secretary
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