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September 13, 2005

Via E-mail and U.S. Mail

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Re: Oakland County's PM-2.5 Designation Challenge;  
Air Docket No. OAR-2003-0061; RIN-2060-AM04

Dear Geoff:

On behalf of Oakland County, Michigan, enclosed for filing is a technical report entitled "Oakland County PM-2.5 Attainment Analysis: Supplemental Report." The report, which was prepared by Gradient Corporation ("Gradient"), addresses several issues that were raised during our July 14, 2005 meeting in Research Triangle Park; this report also supplements Oakland County's pending petition for reconsideration. The key points are as follows:

1. **Prevailing Wind Data.** At the meeting held in July, EPA questioned whether the wind speed and wind direction data obtained at the Detroit City Airport were representative of the entire metropolitan area. In its new report, Gradient has added wind data collected at the Detroit Metropolitan Airport, the Flint/Bishop Airport, and the Oak Park weather station. While the Oak Park Station recorded slightly lower wind speeds than the other weather stations, the wind directions at these three locations were very similar to the wind directions at Detroit City Airport.
2. **Updated PM-2.5 Data for Oakland County.** Using updated PM-2.5 data for 2004, Gradient has again examined whether, and to what extent, the PM-2.5 levels measured in Oakland County relate to wind direction and wind speed. This analysis shows that when the wind is blowing from the north, the PM-2.5 levels in Oakland County are below rural background levels. These low levels are

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measured when the wind is blowing at high speeds and when the wind is blowing at low speeds. By contrast, when the wind is blowing from the south (from Wayne County into Oakland County), the PM-2.5 levels often exceed EPA's 15  $\mu\text{g}/\text{m}^3$  annual standard. These data confirm that air from Wayne County *increases* PM-2.5 levels in Oakland County.

3. **The Reduction In PM-2.5 Levels Associated With Wind Blowing From Oakland County.** Gradient also has evaluated the impact of wind direction on PM-2.5 levels at specific monitoring stations within Wayne County. First, Gradient examined the PM-2.5 data for the Wayne County monitoring station in Dearborn, which consistently records the highest PM-2.5 levels in the region. Even at the Dearborn station, when the wind is blowing from the north (from Oakland County to Wayne County), PM-2.5 levels are at or near rural background levels due to the influx of clean air from Oakland County.

Second, Gradient examined the PM-2.5 data for the Wayne County monitoring station in Livonia, which is the station closest to the Oakland County border. As expected, when the wind is blowing from the north (from Oakland County into Wayne County), PM-2.5 levels are below rural background levels. Again, when the wind blows from Oakland County into Wayne County, this inflow of clean air from Oakland County *reduces* PM-2.5 levels *and improves* air quality in Wayne County.

**EPA's Factor 1 Emissions Score.** Gradient also has reviewed EPA's "Factor 1" analysis. Gradient's report shows that even if EPA includes all surrounding counties within the Detroit MSA, but takes the small step of adding the upwind Ohio counties near Toledo, Oakland County's "score" would fall by a substantial margin. Indeed, under this approach, Oakland County's Factor 1 "score" would not be much higher than the score assigned to Lucas County, an Ohio County designated by EPA as an attainment area for PM-2.5.

Additionally, in view of the data on wind direction and on PM-2.5 levels, EPA's Factor 1 analysis should include only areas that cause increased PM-2.5 in Wayne County. In developing these emissions scores, rather than using a metropolitan statistical area ("MSA") designed solely for U.S. Census purposes, the agency's Factor 1 analysis should attempt to allocate responsibility for PM-2.5 levels among the areas that are actually raising PM-2.5 levels at the monitoring stations recording non-attainment. A Factor 1 emissions score developed in this way

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would show that Oakland County makes no “contribution” to PM-2.5 levels in Wayne County.<sup>1</sup>

4. **The Adverse Impacts of A Non-Attainment Designation.** As previously explained, by designating Oakland County as a non-attainment area, EPA will discourage economic expansion, discourage Brownfields redevelopment, and create incentives for greenfields development in rural areas. This will simply increase sprawl and increase vehicles miles traveled, which in turn will have a negative impact on air quality. From a policy standpoint, this approach is counter-productive.

Moreover, in the preamble to EPA’s proposed rule on PM-2.5 implementation, the agency again stated that its non-attainment designations are intended to provide information on whether local residents are exposed to unhealthy levels of PM-2.5. Yet the PM-2.5 levels in Oakland County not only meet EPA’s daily and annual standards, but are declining over time. Thus, unless EPA rescinds its non-attainment designation for Oakland County, the agency will be sending an inappropriate and inaccurate message to the residents living in this area.

\* \* \*

Accordingly, EPA should designate Oakland County as an area that is meeting PM-2.5 standards. EPA should acknowledge that Oakland County is making no “contribution” to exceedances of these standards in Wayne County. The agency recognized this point in making its attainment and non-attainment designations for PM-10. There is no evidence justifying a different approach here.

Oakland County will file copies of this letter and the accompanying Gradient report directly with the administrative docket office, but would appreciate your assistance with ensuring that these documents are entered into the e-docket.

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<sup>1</sup> Under this approach, but using EPA’s methodology, Wayne County and its upwind counties would have the following composite emission scores: Wayne – 41.7; Monroe – 26.2; Lucas – 14.3; Washtenaw – 7.4; Lenawee – 4.0; Wood – 3.7; Fulton – 2.7.

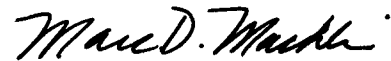
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As always, please feel free to contact me with any questions.

Sincerely,



Marc D. Machlin

cc: OAR-2003-0061 docket manager  
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