STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

November 30, 2004

Mr. Bharat Mathur, Acting Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard (R-19J)
Chicago, Illinois 60604-3507

Dear Mr. Mathur:

The Michigan Department of Environmental Quality (MDEQ) strongly believes that its recommendations for the particulate matter less than or equal to 2.5 microns in diameter (PM-2.5) nonattainment designations, as submitted on February 13, 2004, and reiterated on September 1, 2004, should be followed in lieu of the U.S. Environmental Protection Agency (EPA) proposal of June 29, 2004.

As previously stated, the MDEQ recommends that only Wayne County and Monroe County be designated as nonattainment for PM-2.5, and that each county be designated as a separate nonattainment area. On September 1, 2004, the MDEQ provided additional comments that addressed each of EPA's stated rationale for an expanded nonattainment area. Support for our two-county nonattainment designation recommendations includes the following:

1. The EPA's general rationale for a seven-county PM-2.5 nonattainment area in Southeast Michigan is less applicable than the area-specific rationale we provided. This is clearly evident after reviewing current PM-2.5 monitoring data and historical monitoring data for particulate matter and successful attainment of previous National Ambient Air Quality Standards.

2. The monitoring data is conclusive. Most monitors in the area are measuring attainment, making a widespread nonattainment designation inappropriate from a regulatory perspective and misleading from a public health perspective.

3. The EPA-proposed Clean Air Interstate Rule (CAIR), with the stated purpose of reducing transport of PM-2.5 and precursors from widespread areas, would include all of the Consolidated Metropolitan Statistical Area (CMSA) and therefore address regional controls outside of, but also influencing, nonattainment counties. Most of the transported particulate sources that may be impacting the nonattainment area will be covered by CAIR and the nitrogen oxides State Implementation Plan (SIP) Call regulations.

4. In addition, current federal measures such as the new Tier II vehicle, low sulfur fuels, and the air toxic standards will provide additional PM-2.5 reductions and benefits. As a result of these and other measures, the monitoring data is expected to improve even as the area experiences growth.

5. All these national measures will reduce the regional transport component of PM-2.5 everywhere, not just in the nonattainment areas. The decreasing trends noted for the

PM-2.5 values in Southeast Michigan can be attributed to the recent implementation of these new federal regulations. Nonattainment designations are only needed to address the remaining component of urban excess, and therefore the reasons for widespread nonattainment designations in areas where the monitored data demonstrates attainment is inappropriate.

6. Even though the prevailing winds are from the south and southwest, the downwind monitors in other urban downwind counties in the CMSA still measure attainment, further evidence that the presumptive CMSA boundary is inappropriate as the nonattainment boundary.

7. Michigan has authority to adopt controls beyond the nonattainment boundary if needed for reaching attainment. Also, the EPA is required to reject a SIP if it does not meet the attainment demonstration test. Nothing is gained by lumping in counties where monitors record attainment.

8. Michigan continues to believe that designating Monroe County as a separate nonattainment area would allow it to be redesignated when it reaches attainment, and Michigan's preliminary 2004 data indicates that the area will soon be in attainment.

The enclosed table shows preliminary 2004 PM-2.5 data for the area. We will follow up with the final values as soon as they have been completely reviewed. I urge you to carefully consider all of the above before final designations are developed.

If you have questions regarding our recommendations or comments, please contact Mr. G. Vinson Hellwig, Chief, Air Quality Division, at 517-373-7069, or you may contact me.

Sincerely,

Steven E. Chester
Director
517-373-7917

Enclosure
cc: Mr. Chuck Hersey, Southeast Michigan Council of Governments
Mr. Jim Sygo, Deputy Director, MDEQ
Mr. G. Vinson Hellwig, MDEQ
Ms. Barbara Rosenbaum, MDEQ
Mr. Robert Irvine, MDEQ

Data Completeness and Quarterly Averages of Fine Particulate Material in Michigan
Values Updated 7/28/04

AIRSID	Site	Year	First Qrtr.	Second Qrtr.	Third Qrtr.	Fourth Qrtr.	Annual	**3rd-Yr Annual**
260990009	New Haven	1999	11.66	13.55	13.95	11.45	12.66	
260990009	New Haven	2000	16.26	12.76	12.43	12.22	13.42	
260990009	New Haven	2001	14.75	14.68	13.18	11.78	13.60	13.2
260990009	New Haven	2002	11.86	13.37	15.19	12.98	13.35	13.5
260990009	New Haven	2003	14.47	12.92	13.08	10.92	12.85	13.3
260990009	New Haven	2004	11.82	11.85			11.84	**12.7**
261150005	Luna Pier	1999	---	---	---	12.56	12.56	
261150005	Luna Pier	2000	16.92	14.54	14.33	14.96	15.19	
261150005	Luna Pier	2001	16.24	16.58	15.68	12.69	15.30	15.2
261150005	Luna Pier	2002	14.99	17.77	15.96	16.30	16.26	15.8
261150005	Luna Pier	2003	15.93	12.84	14.36	12.01	13.79	15.1
261150005	Luna Pier	2004	13.02	15.10			14.06	**14.7**
261250001	Oak Park	1999	13.83	14.84	14.64	13.32	14.16	
261250001	Oak Park	2000	18.57	14.79	11.88	16.31	15.39	
261250001	Oak Park	2001	15.58	17.30	14.81	12.23	14.70	14.7
261250001	Oak Park	2002	12.73	17.29	16.07	13.90	15.00	15.0
261250001	Oak Park	2003	18.39	13.79	13.66	12.48	14.58	14.8
261250001	Oak Park	2004	13.73	11.17			12.45	**14.0**
261470005	Port Huron	1999	12.13	13.46	15.12	11.94	13.16	
261470005	Port Huron	2000	17.04	14.65	12.83	12.87	14.35	
261470005	Port Huron	2001	13.65	16.26	14.12	11.81	13.96	13.8
261470005	Port Huron	2002	12.13	14.03	16.28	12.91	13.84	14.0
261470005	Port Huron	2003	18.73	13.11	13.05	12.11	14.25	14.0
261470005	Port Huron	2004	11.44	11.97			11.71	**13.3**
261470005	Port Huron	2001	14.36	15.57	11.79	11.16	13.22	
261470005	Port Huron	2002	12.19	14.36	12.38	12.91	12.96	13.1
261470005	Port Huron	2003	18.46	16.02	14.49	13.70	15.67	**13.9**
261470005	Port Huron	2004	Monitor Shut Down- reduced co-location requirements					
261630001	Allen Park	1999	---	18.99	16.63	14.37	16.66	
261630001	Allen Park	2000	16.99	13.69	14.46	17.08	15.56	
261630001	Allen Park	2001	20.05	16.68	17.46	14.79	17.25	16.5
261630001	Allen Park	2002	15.32	16.15	17.33	15.02	15.96	16.3
261630001	Allen Park	2003	17.37	15.25	15.11	13.17	15.23	16.1
261630001	Allen Park	2004	15.41	11.49			13.45	**14.9**
261630001	Allen Park	1999	---	26.08	18.22	14.54	19.62	
261630001	Allen Park	2000	16.82	13.32	15.29	18.57	16.00	
261630001	Allen Park	2001	18.62	15.82	16.22	14.22	16.22	17.3
261630001	Allen Park	2002	13.10	11.80	16.19	14.63	13.93	15.4
261630001	Allen Park	2003	21.21	16.63	18.77	13.45	17.52	15.9
261630001	Allen Park	2004	12.03	8.70			10.37	**13.9**
261630015	SW HS	1999	18.69	16.54	18.54	16.53	17.57	
261630015	SW HS	2000	20.34	17.04	16.29	18.71	18.10	
261630015	SW HS	2001	19.33	20.05	17.67	16.07	18.28	18.0
261630015	SW HS	2002	16.80	17.42	18.27	17.20	17.42	17.9
261630015	SW HS	2003	17.41	15.39	16.68	17.26	16.69	17.5
261630015	SW HS	2004	14.95	18.49			16.72	**16.9**
261630016	Linwood	1999	---	19.30	15.76	16.17	17.08	

AIRSID	Site	Year	First Qrtr.	Second Qrtr.	Third Qrtr.	Fourth Qrtr.	Annual	**3rd-Yr Annual**
261630016	Linwood	2000	17.67	13.82	13.52	16.94	15.49	
261630016	Linwood	2001	17.19	15.66	16.57	13.47	15.72	**16.1**
261630019	E 7 Mile	2000	---	13.93	13.74	15.87	14.51	
261630019	E 7 Mile	2001	14.58	14.88	14.76	13.79	14.50	
261630019	E 7 Mile	2002	14.39	15.83	17.86	14.48	15.64	14.9
261630019	E 7 Mile	2003	17.05	14.80	13.98	13.01	14.71	15.0
261630019	E 7 Mile	2004	13.23	13.82			13.53	**14.6**
261630025	Livonia	1999	---	---	15.21	10.93	13.07	
261630025	Livonia	2000	16.53	14.08	13.28	14.46	14.59	
261630025	Livonia	2001	15.39	15.67	15.14	12.18	14.60	14.1
261630025	Livonia	2002	13.33	14.26	16.47	13.43	14.37	14.5
261630025	Livonia	2003	15.96	15.36	13.89	11.59	14.20	14.4
261630025	Livonia	2004	12.72	11.31			12.02	**13.5**
261630033	Dearborn	1999	13.98	16.75	18.31	18.24	16.82	
261630033	Dearborn	2000	22.76	20.13	17.56	20.06	20.13	
261630033	Dearborn	2001	20.95	18.58	18.27	20.63	19.61	18.9
261630033	Dearborn	2002	20.99	18.15	20.22	20.00	19.84	19.9
261630033	Dearborn	2003	22.59	19.03	17.83	17.34	19.20	19.5
261630033	Dearborn	2004	17.71	16.48			17.10	**18.7**
261630036	Wyandotte	1999	17.06	14.55	18.85	14.67	16.28	
261630036	Wyandotte	2000	19.30	16.52	15.64	19.07	17.63	
261630036	Wyandotte	2001	21.49	17.53	18.53	15.26	18.20	17.4
261630036	Wyandotte	2002	15.40	15.98	16.51	17.24	16.28	17.4
261630036	Wyandotte	2003	15.07	20.37	16.37	13.45	16.32	16.9
261630036	Wyandotte	2004	13.96	14.47			14.22	**15.6**