



Minnesota Pollution Control Agency

Office of the Commissioner

February 13, 2004

Mr. Thomas Skinner
Regional Administrator
U.S. Environmental Protection Agency
Region 5 (RA-19J)
77 West Jackson Boulevard
Chicago, IL 60604

RE: Governor's Letter Recommending Attainment Designation for PM_{2.5}

Dear Mr. Skinner:

Pursuant to Section 107(d)(1) of the Clean Air Act, and following promulgation of the fine particle (PM_{2.5}) National Ambient Air Quality Standard (NAAQS) on July 18, 1997, the Governor of Minnesota recommends that the entire state of Minnesota be designated as attainment for the PM_{2.5} standard. This recommendation does not include areas within the state that are under tribal jurisdiction.¹

This designation recommendation is based on three consecutive years of air sampling data collected at 17 federal reference method monitors around the state. The summary data are provided in a table of the mean value at each monitoring site for each year (2000-2003) and of three-year calculated averages (2000-2002 and 2001-2003) for each site (enclosed). No site in the state exceeded the annual standard (15 ug/m³) for fine particulate for any three-year period. Quality assured PM_{2.5} monitoring data for Minnesota has been submitted to the Air Quality System (AIRS) through 2003.

In the "Air Quality Data Update 2000-2002 PM_{2.5} Air Quality Data" document on EPA's Airtrends website, it states, "We intend to base designation decisions on the most recent three years of complete data available (2001-2003)." This was also stated in the letter from Thomas Skinner to Governor Tim Pawlenty dated June 2, 2003. For this reason, we are submitting the design values for both three-year averages (2000-2002 and 2001-2003) at this time. According to the EPA Airtrends website, the annual PM_{2.5} standard determines the attainment status of a county for the years 2000-2002 for the entire country. Therefore, we have only included the annual design values with this submission. No monitor site exceeded the daily standard (65 ug/m³) in Minnesota.

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The Commissioner of the Minnesota Pollution Control Agency (MPCA) is appointed by the Governor. The Commissioner is duly authorized to submit this letter on behalf of the Governor.

We anticipate that you will agree with this recommendation for state-wide attainment designation. If you have questions or comments on this submission, please contact either Gordon Andersson at (651) 296-7667 or David Kelso at (651) 296-7802 of my staff.

Sincerely,



Sheryl A. Corrigan
Commissioner

SAC:jae

Enclosure

cc: Steven Rothblatt, EPA Region 5
Douglas Aburano, EPA Region 5

¹ EPA has stated that it will not delegate to any state the operation of federal environmental programs on Indian lands, including Indian reservations. In Minnesota, EPA has taken the position that the Mille Lacs Indian Reservation near Lake Mille Lacs encompasses approximately 61,000 acres and includes the townships of Kathio, South Harbor and Isle Harbor in Mille Lacs County. The State of Minnesota's position is that the Mille Lacs Indian Reservation is comprised of only Indian trust land (approximately 2,000-3,000 acres) within these townships.

This disagreement over the boundary of the Mille Lacs Indian Reservation is not, however, well-suited for resolution in an administrative forum, which does not allow for adequate presentation of the complex historical evidence fundamental to an analysis and review of Indian treaty disputes. Thus, the MPCA has agreed to cooperate with EPA and has allowed EPA to continue to operate federal environmental programs within the area that EPA describes as the Mille Lacs Indian Reservation with the explicit written understanding that MPCA's cooperation does not constitute a concession that EPA's position on the boundary is correct nor a waiver of the State's right in the future to seek resolution of the boundary dispute in an appropriate forum.

PM 2.5 Concentrations (ug/m3) in Minnesota

AQS Site No.	Site Name	2000 Mean	2001 Mean	2002 Mean	3-yr avg (00-02)	Category (00-02)	2003 Mean	3-yr avg (01-03)	Category (01-03)
DAKOTA County									
27-037-0470	Apple Valley	X	9.81	9.82	X	<i>incomplete</i>	9.38	9.67	<i>complete</i>
27-037-6018	Hastings	12.30	10.56	9.73	10.86	<i>complete *</i>	9.01	9.77	<i>complete *</i>
HENNEPIN County									
27-053-0961	Mpls	12.39	10.99	9.94	11.11	<i>complete *</i>	9.50	10.14	<i>complete</i>
27-053-0963	Phillips	X	11.25	10.21	X	<i>incomplete</i>	10.15	10.54	<i>complete</i>
27-053-1007	Humboldt	13.01	11.80	10.50	11.77	<i>incomplete</i>	9.98	10.76	<i>complete *</i>
27-053-2006	St. Louis Park	11.62	11.03	10.15	10.93	<i>incomplete</i>	9.34	10.17	<i>complete</i>
MILLE LACS County									
27-095-3051	Mille Lacs	8.70	7.33	7.02	7.68	<i>incomplete</i>	6.90	7.08	<i>complete *</i>
OLMSTED County									
27-109-5008	Rochester	11.85	11.97	10.62	11.48	<i>incomplete</i>	10.18	10.92	<i>complete *</i>
RAMSEY County									
27-123-0866 **	Red Rock	13.13	12.78	11.32	12.41	<i>complete</i>	11.84	11.98	<i>complete</i>
27-123-0868	Cedar	13.76	12.96	11.18	12.63	<i>complete *</i>	11.52	11.89	<i>complete *</i>
27-123-0871	Harding	12.48	11.77	10.41	11.55	<i>incomplete</i>	10.21	10.80	<i>complete</i>
27-123-0872	Randolph	12.53	10.96	10.04	11.18	<i>complete</i>	9.54	10.18	<i>complete</i>
ST LOUIS County									
27-137-7001	Virginia	7.47	6.84	6.95	7.09	<i>complete</i>	6.40	6.73	<i>complete</i>
27-137-7550	Duluth Univ.	7.21	7.08	6.27	6.85	<i>complete</i>	6.72	6.69	<i>complete</i>
27-137-7551	Duluth W. 4th	8.67	8.83	7.86	8.45	<i>complete *</i>	8.27	8.32	<i>complete *</i>
SCOTT County									
27-139-0505	Shakopee	12.45	10.44	9.79	10.89	<i>complete *</i>	9.10	9.78	<i>complete *</i>
STEARNS County									
27-145-3052	St. Cloud	11.55	11.01	9.24	10.60	<i>incomplete</i>	8.93	9.73	<i>complete *</i>

* These sites were found to have acceptable design values for the specified county.

** Site 27-123-0866 is applicable to the PM 2.5 daily standard only. It was listed as a source-oriented monitoring site in the PM 2.5 monitoring plan grant application submitted August 3, 1998 to George Stone, Acquisition Assistance Branch at EPA V. This plan was approved and funded.

3-year arithmetic mean must exceed 15 ug/m3 to violate the annual standard