



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary

101 S. Webster St.
Box 7921
Madison, Wisconsin 53707-7921
Telephone 608-266-2621
FAX 608-267-3579
TTY 608-267-6897

June 11, 2004

Michael Leavitt, Administrator
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave N.W.
Mail Stop Code 3213A
Washington, D.C. 20460

RECEIVED

JUL - 7 2004

OFFICE OF THE
EXECUTIVE SECRETARIAT

Subject: Response to U.S. EPA Request for Recommended PM-2.5 Area Designations

Dear Administrator Leavitt;

Wisconsin is pleased that the US-EPA is moving forward to implement the PM-2.5 national ambient air quality standards. The new standards can be expected to result in improvements to the respiratory health and general well-being of millions of the nation's residents.

At this time I am not in a position to recommend any designation of Wisconsin counties as either attainment or nonattainment for purposes of EPA's designation process for a number of reasons. EPA has not promulgated the PM-2.5 implementation guidance and a final designation memorandum. Wisconsin's most recent year of data for the annual standard (2003) has not been fully quality-assured. In addition, the regional assessment of the relative scope and significance of Wisconsin direct contribution to the PM-2.5 problem in downwind nonattainment areas has not been finalized.

Wisconsin believes EPA needs to finalize the PM-2.5 guidance and promulgate this guidance as expeditiously as practicable so we can pursue timely discussion regarding your proposed area designations in the context of final EPA guidance. I also understand that EPA will send preliminary designations to all states by early summer, whether or not a state has made a formal recommendation. Therefore, I urge EPA to provide Wisconsin with the full 120day review and appeal process for such action as directed by the Clean Air Act once the implementation guidance for this new standard is complete.

Sincerely,

Jim Doyle
Governor

Co: Scott Hassett, DNR
Al Shea, DNR
Lloyd Eagan, DNR