



**Fond du Lac
Environmental
Program**

December 11, 2013

Ms. Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd
Chicago, IL 60604

RE: PM_{2.5} Designation on the Fond du Lac Reservation

Dear Ms. Hedman:

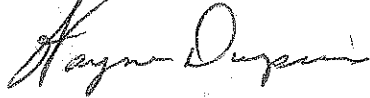
The Fond du Lac Band (the Band) hereby recommends that the Fond du Lac Reservation be designated “unclassifiable/attainment” for the new National Ambient Air Quality Standards (NAAQS) for fine particulate matter (PM_{2.5}).

On December 14, 2012, the EPA promulgated a revised primary annual PM_{2.5} NAAQS of 12.0 ug/m³, while retaining the existing 24-hour PM_{2.5} standard, as well as the existing PM₁₀ standard and all secondary standards. On April 16, 2013, the EPA issued a memorandum on *Initial Area Designations for the 2012 Revised Primary Annual Fine Particulate National Ambient Air Quality Standard*. Based on this guidance, the Band believes that the Reservation should be designated “unclassifiable/attainment” for PM_{2.5} for the following reasons.

- While the Band has in the past operated a PM_{2.5} monitor (albeit not a Federal Reference Method) on the Reservation, we do not currently operate this monitor due to lack of funding. While we would prefer to make a recommendation based on our own data, in the absence of that data, we reference data collected in Duluth, Minnesota.
- The Minnesota Pollution Control Agency operates three PM_{2.5} monitors at two locations in Duluth. These monitors indicate compliance with the standard.

In terms of making future designation determinations, the Band would like to be considered for funding to conduct further monitoring work, or to receive additional training in air dispersion modeling. If you have any further questions, please call Alex Jackson or Joy Wiecks of my staff at 218.878.7112 or 218.878.7108, respectively.

Sincerely,



Wayne Dupuis
Fond du Lac Environmental Program Manager

cc. Sean Copeland, Fond du Lac Legal Office
Ben Giwojna, EPA - Region 5