



JIM DOYLE
GOVERNOR
STATE OF WISCONSIN

August 9, 2004

Bharat Mathur, Acting Regional Administrator
USEPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Dear Mr. Mathur:

Thank you for the opportunity to comment on EPA's proposal to include Kenosha County, Wisconsin in the fine-particle (PM_{2.5}) nonattainment area for the greater Chicago, Kenosha, Gary metropolitan area. At this time, I am strongly recommending that you designate Kenosha County as an attainment area for the PM_{2.5} National Ambient Air Quality Standard. Kenosha County has a minimal impact on the air quality of the Greater Chicago CMSA and have already added controls on major sources of pollution. This letter highlights the key reasons for my recommendation of attainment for Kenosha County.

Several key factors support my request for EPA to designate Kenosha County as attainment for the PM 2.5 ambient air quality standard. Please consider these factors carefully in making your final decisions on the nonattainment area boundaries for fine particle pollution.

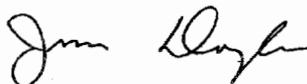
- The monitor located in Kenosha County is clean for PM_{2.5}. In fact the design value for this monitoring site is 11.7 ppm which is well below the 15 ppm standard.
- A monitor in Lake County Illinois, which falls in between the Kenosha County monitor and the violating monitor in urban Chicago, is also clean from a PM 2.5 standpoint. If Kenosha County were significantly contributing to the PM_{2.5} levels in the area, we would expect to see higher levels at the Lake County monitoring location as well.
- The predominate wind direction from Kenosha County is away from the violating counties in the Chicago CMSA.
- Ninety percent of the emissions in the Chicago CMSA are covered by the area outside of Kenosha County in areas of Illinois and Indiana. Additionally, according to the Year 2000 U.S. Census, approximately seventy-five percent of the Kenosha County commuters travel to Lake County, IL that also meets the PM_{2.5} standard. This further supports that Kenosha County residents have little impact on the Chicago CMSA.

- Kenosha County has a lower urban density than the area with the monitor that violates the PM2.5 standard. Furthermore, the further away from the area of urban density, the lower the PM2.5 measurements are. This would tend to indicate that the problem originates in the urban area instead of coming from the less dense area into the urban area.
- Finally and most importantly, approximately 97% of sulfur dioxide and 78% of nitrogen oxide emissions in Kenosha County come from the Pleasant Prairie Power Plant operated by WE Energies. That company has already installed Selective Catalytic Reduction (SCR) on one unit. In addition, Wisconsin DNR issued permit number 03-RSG-296 on April 5, 2004 to WE Energies allowing installation of SCR on the remaining unit as well as scrubbers to control sulfur dioxide emissions on both units. These controls are expected to be fully operational by January 2008 (when SIP submittals are due) and will be federally enforceable. This level of control translates to a greater than 80% reduction in sulfur dioxide emissions and greater than 70% reduction in nitrogen oxide emissions at the Pleasant Prairie Power Plant. We believe this takes care of Wisconsin's obligation for fine particle emission control in Kenosha County.

I am well aware of the serious health effects associated with exposure to fine-particles, but I am also aware of the potential problems for a community that is designated as a nonattainment area. Therefore, I urge EPA to select an approach that minimizes the size of fine-particle nonattainment areas in favor of a strong interstate control program for fine-particles and ozone. Wisconsin has provided comments on the proposed Clean Air Interstate Rule (CAIR) under separate cover. Strengthening the CAIR rule will greatly assist all of us in addressing the air quality and health issues associated with fine-particles and ozone. It's an approach that meets air quality goals without imposing expensive local controls on urbanized areas.

Thank you again for providing this opportunity to address this important air quality issue and if you would like to discuss this matter in greater detail, please feel free to contact Patrick Henderson in my office or Al Shea, Division Administrator, Air and Waste at the Department of Natural Resources.

Sincerely,



Jim Doyle
Governor

Cc: Representative Paul Ryan
State Senator Bob Wirth
State Representative Jim Krueser
State Representative John Steinbrink
State Representative Samantha Kerkman
John Anteramian, Mayor Kenosha
Al Shea - DNR-AD/5
Lloyd Eagan - DNR-AM/7