



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, MN 55155-4194 | 651-296-6300 | 1-800-657-3864 | 651-282-5332 TTY | www.pca.state.mn.us

December 14, 2007

Ms. Mary Gade
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 Ms. Gade:

Pursuant to Section 107(d) of the Clean Air Act, and following promulgation of the revised fine particle (PM_{2.5}) National Ambient Air Quality Standard (NAAQS) on October 17, 2006 (71 FR 61144), the Governor of Minnesota recommends that the entire State of Minnesota be designated as attainment for the PM_{2.5} standard. The effective date of the new 24-hour standard was December 18, 2006. According to the memorandum of June 08, 2007 from Robert Meyers, Acting Assistant Administrator Office of Air Radiation, States need only submit designation requests for the new 24-hour standard, one year from the effective date. 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 15 federal reference method monitors around the State. The summary data are provided in a table of the 98th percentile value at each monitoring site for each year (2004-2006) and of three-year calculated averages (2004-2006) of the 98th percentile for each site (enclosed). No monitor site in the State exceeded the 24-hour standard (35 ug/m³) for fine particulate for any year. Quality assured PM_{2.5} monitoring data for Minnesota has been submitted to the Air Quality System through June 2007.

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

Ms. Mary Gade
Page 2

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,



Brad Moore
Commissioner

BM:sth

Enclosure

cc: Steven Rothblatt, Director, Air and Radiation Division, EPA Region 5
John Mooney, Chief, Criteria Pollutants Section, EPA Region 5
Kathleen D'Agostino, EPA Region 5
John Summerhays, EPA Region 5

¹ Environmental Protection Agency (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.

24-hr PM 2.5 Concentrations (ug/m3) in Minnesota

AQS Site No.	City	Site Name	2004 98th %	2005 98th %	2006 98th %	3-Yr avg. 04-06
DAKOTA County						
27-037-0470	Apple Valley	Apple Valley	30.30	31.70	24.60	28.87
HENNEPIN County						
27-053-0961	Richfield	Richfield Int. School	27.10	28.10	22.30	25.83
27-053-0963	Minneapolis	H.C. Andersen School	28.60	30.00	19.40	26.00
27-053-1007	Minneapolis	Humboldt Avenue	25.90	28.10	22.20	25.40
27-053-2006	St. Louis Park	St. Louis Park	27.10	29.60	21.30	26.00
MILLE LACS County						
27-095-3051	not in city	Mille Lacs - tribal	17.20	27.10	22.20	22.16
OLMSTED County						
27-109-5008	Rochester	Ben Franklin School	27.50	33.30	28.60	29.80
RAMSEY County						
27-123-0866	St. Paul	Red Rock Road	28.00	31.20	23.10	27.43
27-123-0868	St. Paul	Ramsey Health Center	35.20	23.20	23.20	27.20
27-123-0871	St. Paul	Harding High School	25.00	29.60	24.40	26.33
ST LOUIS County						
27-137-7001	Virginia	Virginia	18.30	21.80	23.70	21.26
27-137-7550	Duluth	WDSE	18.20	21.30	18.30	19.27
27-137-7551	Duluth	Lincoln Park School	21.80	25.20	23.50	23.50
SCOTT County						
27-139-0505	Shakopee	B.F. Pearson School	28.10	27.20	21.00	25.43
STEARNS County						
27-145-3052	St. Cloud	Talahi School	27.00	25.20	17.50	23.23

The three-year mean of 98th percentile values of 24-hour PM_{2.5} concentrations must exceed 35 ug/m³ to violate the standard.