STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

December 18, 2007

VIA E-MAIL and U.S. MAIL

Ms. Mary Gade, Regional Administrator
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (R-19J)
Chicago, Illinois 60604-3507

Dear Administrator Gade:

In response to the United States Environmental Protection Agency's (EPA's) request for designation recommendations on the revised 24-hour National Ambient Air Quality Standard (NAAQS) for fine particulate (PM2.5) consistent with Section 107(a) of the Clean Air Act, the Michigan Department of Environmental Quality (MDEQ) hereby submits the attainment and nonattainment designation recommendation for areas of the state of Michigan with appropriate boundaries indicated. These recommendations are based on ambient air quality monitoring data for 2004-2006.

The MDEQ recommends that Wayne County be designated as a 24-hour PM2.5 nonattainment area. Wayne County should be a distinct and separate nonattainment area. The concentration of industrial source contributors on a microscale level to high PM2.5 days experienced in southwest Detroit and Dearborn indicate a need for a unique plan for this county. St. Clair County should also be designated as a separate nonattainment area, as there is some indication of significant contribution of emissions from Sarnia, Ontario on some high PM2.5 days. The counties of Monroe, Washtenaw, Livingston, Oakland, and Macomb should be designated as another separate nonattainment area. On the west side of Michigan, the MDEQ recommends that Kent County be designated as nonattainment. All other counties in Michigan should be designated as attainment. Enclosed is Table 1, which shows the PM2.5 24-hour ambient air monitoring data for the 2004-2006, and Figure 1 shows the PM2.5 monitor network.

The MDEQ, along with the Southeast Michigan Council of Governments (SEMCOG), the Lake Michigan Air Directors Consortium, and scientific experts in the region, have been studying the PM2.5 situation in Southeast Michigan for several years. A much greater understanding of PM2.5 and source contribution has come of this effort and considerable progress has been made. At this time, only two monitors in Wayne County do not meet the annual PM2.5 NAAQS. We believe that the recommended separate nonattainment area designations would enhance flexibility in state planning and will in no way impair progress toward attaining and maintaining the annual or the 24-hour standards.

If you have any questions regarding this submittal, please contact Mr. G. Vinson Hellwig, Chief, Air Quality Division, at 517- 373-7069, or you may contact me.

Sincerely,

Acting

Steven E. Chester
Director
517-373-7917

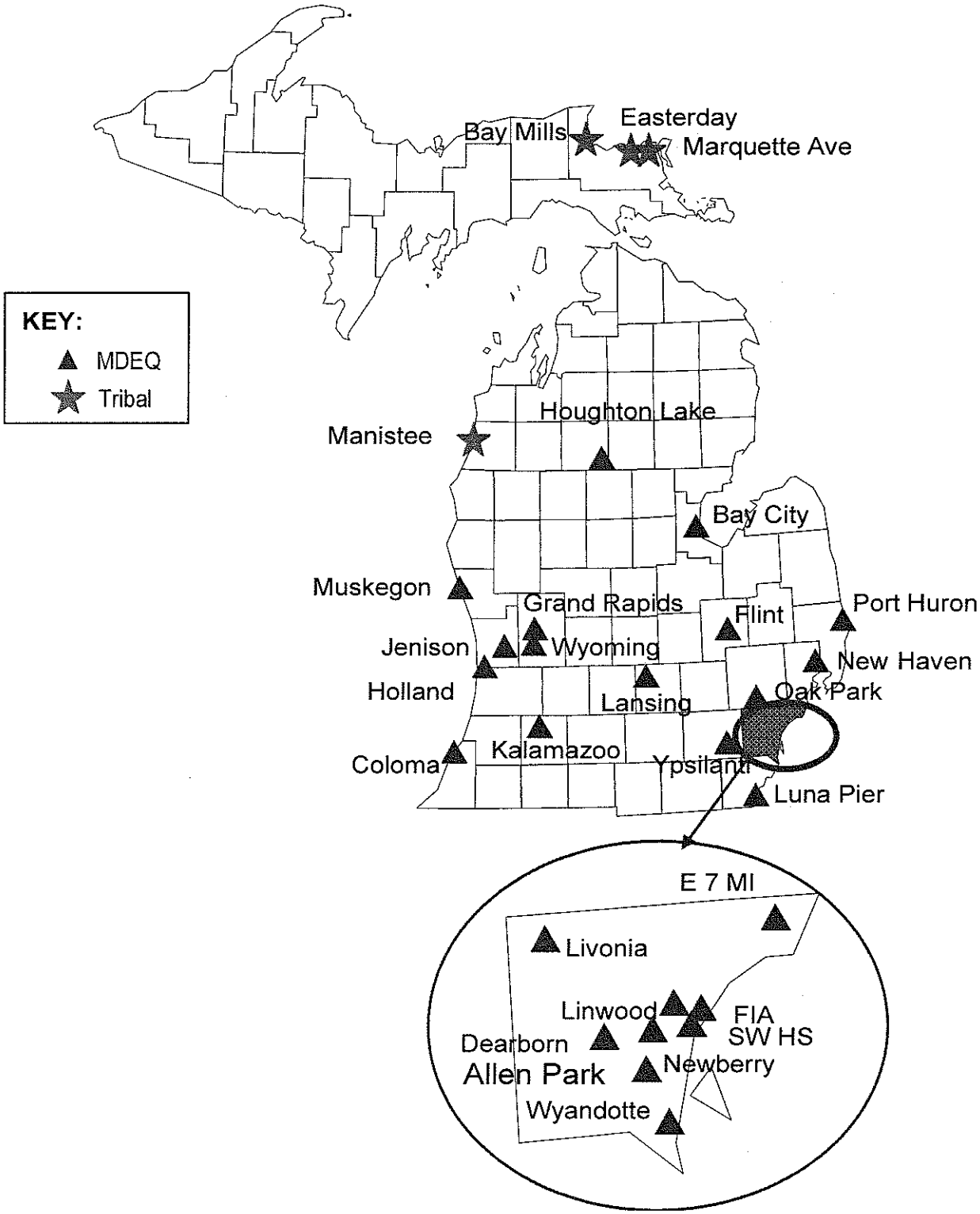
Enclosure
cc: Governor Jennifer M. Granholm
Ms. Cheryl L. Newton, EPA
Mr. Stanley F. Pruss, Governor's Office
Mr. Chuck Hersey, SEMCOG
Mr. Jim Sygo, Deputy Director, MDEQ
Ms. JoAnn Merrick, Chief of Staff, MDEQ
Mr. G. Vinson Hellwig, MDEQ

Table 1
98th Percentile 24-hour PM2.5 Values Averaged over 3 Years

24-hr NAAQS = 35 ug/m3

AIRS ID	Site	County	POC	2004 98th % ile	2005 98th % ile	2006 98th % ile	04-06 Avg
260050003	Holland	Allegan	1	30.3	36.1	34.1	34
260070005	Alpena	Alpena	1	---	---	---	---
260140014	Bay City	Bay	1	28.0	40.5	27.9	32
260210014	Coloma	Berrien	1	29.0	33.8	27.7	30
260490021	Flint	Genesee	1	27.9	35.9	26.7	30
260550003	Traverse City	Grand Traverse	1	---	---	---	---
260650012	Lansing	Ingham	1	29.4	38.1	28.3	32
260650012	Lansing	Ingham	2	---	---	---	---
260770008	Kalamazoo	Kalamazoo	1	27.3	33.3	29.1	30
260770008	Kalamazoo	Kalamazoo	2	28.9	31.5	29.1	30
260810007	Wealthy	Kent	1	---	---	---	
260810020	Grand Rapids	Kent	1	31.8	44.7	33.2	37
260810020	Grand Rapids	Kent	2	30.5	45.6	31.5	36
260990009	New Haven	Macomb	1	31.9	41.5	34.4	36
261010922	Manistee	Manistee	1	---	---	25.9	---
261130001	Houghton Lake	Missaukee	1	21.0	30.8	21.6	24
261150005	Luna Pier	Monroe	1	35.0	49.3	32.6	39
261210040	Muskegon	Muskegon	1	32.7	41.0	29.8	35
261210040	Muskegon	Muskegon	2	---	---	---	---
261250001	Oak Park	Oakland	1	32.5	52.2	33.0	39
261390005	Jenison	Ottawa	1	30.9	42.3	30.2	34
261450018	Saginaw	Saginaw	1	27.4	37.8	---	33
261450018	Saginaw	Saginaw	2	---	---	---	---
261470005	Port Huron	St. Clair	1	32.2	47.6	37.9	39
261470005	Port Huron	St. Clair	2	---	---	---	---
261610005	Ann Arbor	Washtenaw	1	28.4	39.1	---	34
261610008	Ypsilanti	Washtenaw	2	31.2	54.6	33.0	40
261630001	Allen Park	Wayne	1	36.9	43.0	34.1	38
261630001	Allen Park	Wayne	2	33.8	58.0	34.2	42
261630015	SW High Sch.	Wayne	1	36.0	49.7	36.2	41
261630016	Linwood	Wayne	1	38.3	51.8	36.9	42
261630019	E 7 Mile	Wayne	1	35.0	52.3	36.2	41
261630025	Livonia	Wayne	1	32.2	40.2	30.4	34
261630033	Dearborn	Wayne	1	39.4	50.2	43.1	44
261630036	Wyandotte	Wayne	1	32.3	46.7	33.2	37
261630038	Newberry	Wayne	1	36.8	57.5	28.6	41
261630039	FIA/Lafayette	Wayne	1	---	43.9	32.4	38

Figure 1

PM 2.5 Monitors in 2007

Federal Reference Method Monitors