UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 28 2011

REPLY TO THE ATTENTION OF:

The Honorable Rick Snyder
Governor of Michigan
P.O. Box 30013
Lansing, Michigan 48909

Dear Governor Snyder:

Thank you for your recommendations on air quality designations for the revised primary National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO_2) throughout Michigan. This letter is to notify you of the U.S. Environmental Protection Agency's response to Michigan's designation recommendations, and to inform you of our approach for completing the designations for the revised NO_2 NAAQS.

On January 22, 2010, EPA strengthened the health-based NO_2 NAAQS by setting a new 1-hour NO_2 standard at the level of 100 parts per billion (ppb). This new standard will protect against adverse health effects associated with short-term exposure to NO_2, including respiratory effects that can result in hospital admissions. EPA also retained with no change the annual average NO_2 standard of 53 ppb.

This suite of standards will protect public health by limiting people's exposures to short-term peak NO_2 concentrations and by limiting community-wide NO_2 concentrations to levels below those that have been linked to respiratory-related emergency department visits and hospital admissions. To determine compliance with the new standard, EPA established new ambient air monitoring and reporting requirements for NO_2. In urban areas, monitors are required near major roads as well as in other locations where maximum concentrations are expected. Additional monitors will be required in some large urban areas to measure the highest concentrations of NO_2 that occur more broadly across communities.

In the preamble to the 2010 NO_2 NAAQS and in the EPA's November 2010 letter to you requesting designation recommendations, the Agency stated that it expected to designate most areas of the country as "unclassifiable," indicating that there are insufficient data to determine whether or not an area is attaining the revised NO_2 NAAQS. This approach took into account that the new monitoring network requirements established with the revised NO_2 NAAQS will not be effective until January 2013 and that air quality data from these new monitors would not be available to inform these initial designations.

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The Agency has reviewed your recommendations and others, and intends to designate all areas of Michigan, as well as the rest of the country, as "unclassifiable/attainment" rather than "unclassifiable." Based on air quality data from 2008-2010, all monitored areas in the country meet the 2010 NO_2 NAAQS. While the EPA acknowledges that the existing NO_2 monitoring network does not provide adequate evidence to determine whether or not the new NAAQS is met in all areas, there currently is no evidence of violations anywhere in the country. The "unclassifiable/attainment" designation better reflects the current air quality conditions. EPA intends to redesignate areas, as appropriate, after sufficient air quality data from the new monitoring network are available.

EPA intends to designate Michigan unclassifiable/attainment using the boundaries Michigan recommended to the EPA or revised boundaries you may provide in response to this letter. In past designations for NO_2, for the majority of states, the area of the state where the air quality could not be classified, or was better than the national standards, was given a statewide, or rest-of-state designation. However, EPA recommends that your state carefully consider the implications for the Prevention of Significant Deterioration permitting program of having the entire state designated as a single area rather than smaller areas (e.g., counties, groups of counties, etc.) To ensure that the size of designated areas is consistent with your state's objectives for managing air quality deterioration and economic growth, we recommend that your permitting staff be consulted on the area boundary issues.

If your state has additional information that you want EPA to consider with respect to EPA's designation, please submit it to us by August 29, 2011. We are also making EPA's preliminary designation decisions and supporting documentation available to the general public for review. We are accepting public comments on our preliminary decisions for 30 days after a notice announcing the public comment period is published in the *Federal Register*. We will review any information we receive from the State of Michigan and the general public by this date, and we plan to promulgate the final designations by October 31, 2011.

We look forward to a continued dialogue with you and your staff as we work together to implement the 2010 NO_2 NAAQS. If you have any questions, please call me at (312) 886-3000 or your staff may contact Cheryl L. Newton, Region 5 Air Division Director, at (312) 353-2212.

Sincerely,

Susan Hedman
Regional Administrator

cc: Dan Wyant
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