



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



STEVEN E. CHESTER  
DIRECTOR

March 4, 2009

Mr. Bharat Mathur, Acting Regional Administrator  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard (R-19J)  
Chicago, Illinois 60604-3507

Dear Mr. Mathur:

Consistent with recent U.S. Environmental Protection Agency (EPA) guidance, states may petition to use 2006-2008 ambient air monitoring data as the basis of the final attainment designations for the revised 24-hour National Ambient Air Quality Standard for fine particulate matter less than 2.5 micrometers in diameter (PM<sub>2.5</sub>). As such, the Michigan Department of Environmental Quality (MDEQ) hereby formally petitions the EPA to use the MDEQ's 2006-08 data for the final designations. Under separate cover, (February 26, 2009), the MDEQ certifies that all of this data is complete, validated and entered into the EPA's Air Quality System.

Based on the 2006-2008 data, monitors on the west side of Michigan, in Kent and Ottawa Counties, are meeting the PM<sub>2.5</sub> 24-hour standard. The MDEQ respectfully requests that these counties be designated as attainment.

Also based on the 2006-2008 data, only one monitor in Southeast Michigan, in Wayne County, is showing nonattainment of the standard. All other monitors in Southeast Michigan, including the eight other monitors in Wayne County, are meeting the PM<sub>2.5</sub> 24-hour standard. The MDEQ therefore respectfully requests that the counties of Oakland, Macomb, Washtenaw, St. Clair, Livingston, and Monroe be designated as attainment.

A single county nonattainment area for Southeast Michigan is appropriate. The high concentration of industrial source contributors on a microscale level in the southwest Detroit area of the one remaining high monitor, along with the highest PM<sub>2.5</sub> levels in that area, indicates a need for a unique plan for this county. To designate additional counties in Southeast Michigan that now are meeting the standard is inappropriate, unnecessary, and would serve to economically penalize the entire region.

The enclosed table contains the monitoring values for each PM<sub>2.5</sub> monitor in the state, with the right column showing the quality-assured 2006 through 2008 average for each monitor. Three-year average values greater than 35 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) violate the standard; the Dearborn monitor is the only one above the standard, at 37  $\mu\text{g}/\text{m}^3$ .

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. Chester", with a long horizontal flourish extending to the right.

Steven E. Chester  
Director  
517-373-7917

Enclosure

cc: Ms. Cheryl Newton, EPA  
Mr. Jim Sygo, Deputy Director, MDEQ  
Mr. G. Vinson Hellwig, MDEQ

**PM<sub>2.5</sub> 24-HOUR AVERAGES**

AIRS ID	Site	County	POC	2006	2007	2008	06-08
				98th % ile	98th % ile	98th % ile	Avg
260050003	Holland	Allegan	1	34.1	31.7	24.5	30
260070005	Alpena	Alpena	1	---	---	---	---
260140014	Bay City	Bay	1	27.9	25.2	23.6	26
260210014	Coloma	Berrien	1	27.7	33.0	24.8	29
260490021	Flint	Genesee	1	26.7	25.1	25.8	26
260550003	Traverse City	Grand Traverse	1	---	---	---	---
260650012	Lansing	Ingham	1	28.3	29.0	24.0	27
260650012	Lansing	Ingham	2	---	---	---	---
260770008	Kalamazoo	Kalamazoo	1	29.1	29.2	26.0	28
260770008	Kalamazoo	Kalamazoo	2	29.1	32.5	24.1	29
260810007	Wealthy	Kent	1	---	29.7	26.8	
260810020	Grand Rapids	Kent	1	33.2	29.7	24.9	29
260810020	Grand Rapids	Kent	2	31.5	31.7	22.5	29
260990009	New Haven	Macomb	1	34.4	29.0	28.9	31
261130001	Houghton Lake	Missaukee	1	21.6	23.2	21.1	22
261150005	Luna Pier	Monroe	1	32.6	32.2	28.6	31
261210040	Muskegon	Muskegon	1	29.8	28.1	26.3	28
261210040	Muskegon	Muskegon	2	---	---	---	---
261250001	Oak Park	Oakland	1	33.0	35.3	30.4	33
261390005	Jenison	Ottawa	1	30.2	28.1	27.1	28
261450018	Saginaw	Saginaw	1	---	---	---	---
261450018	Saginaw	Saginaw	2	---	---	---	---
261470005	Port Huron	St. Clair	1	37.9	36.3	31.0	35
261470005	Port Huron	St. Clair	2	---	---	---	---
261610008	Ypsilanti	Washtenaw	1	31.3	34.5	28.2	31
261610008	Ypsilanti	Washtenaw	2	33.0	30.6	31.3	32
261630001	Allen Park	Wayne	1	32.8	31.0	30.3	31
261630001	Allen Park	Wayne	2	34.2	36.2	32.3	34
261630015	SW High School	Wayne	1	36.2	34.0	34.3	35
261630016	Linwood	Wayne	1	36.9	34.3	30.0	34
261630019	E 7 Mile	Wayne	1	36.2	31.9	31.9	33
161630025	Livonia	Wayne	1	30.4	32.8	28.3	31
261630033	Dearborn	Wayne	1	43.1	36.6	31.7	37
261630036	Wyandotte	Wayne	1	33.2	28.6	26.3	29
261630038	Newberry	Wayne	1	28.6	33.4	31.5	31
261630039	FIA/Lafayette	Wayne	1	32.4	34.8	31.7	33

Units of Measure  $\mu\text{g}/\text{m}^3$