

OCT 03 2016



Forest County Potawatomi Community
P.O. Box 340 • Crandon, Wisconsin 54520

September 30, 2016

USEPA, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3507

Dear Mr. Kaplan;

The Forest County Potawatomi Community (FCPC) would like to thank the U.S. Environmental Protection Agency (EPA) for providing FCPC the opportunity to participate in the designations process for the 2015 Ozone (O₃) National Ambient Air Quality Standard (NAAQS).

Background

The FCPC is a federally recognized Indian Tribe and is organized under the Indian Reorganization Act of 1934, 25 U.S.C. § 461-479. With a membership of more than 1,400 people, FCPC exercises governmental authority under a Constitution originally adopted on February 6, 1937.

The FCPC's strong commitment to the environment and duty to protect and enhance resources both on and off the Reservation is evident in its 1994 application for Class I designation of its airshed under Section 164(c) of the Clean Air Act's (CAA) Prevention of Significant Deterioration (PSD) program. This unique designation affords the Community greater protections for natural and cultural resources through smaller allowances of ambient air pollution PSD increment, the designation of sensitive resources as Air Quality Related Values (AQRVs), and participation in the PSD new construction/modification permit application review process. Ozone is one of the pollutants that FCPC has established a threshold that applies to applicants seeking a PSD air pollution permit.

The Forest County Potawatomi Community's concern for air quality and protection of its resources led to the establishment of an air monitoring program and development of an extensive air monitoring station located near Sugarbush Hill, approximately 4 miles east of Crandon, WI. As required in 40 CFR part 58 appendix A (1.1)(c) for SLAMS and PSD air monitoring, data collected at FCPC's air monitoring station is in accordance with Federal Reference Method (FRM) and Federal Equivalent Method (FEM) monitors, using EPA approved QAPPs and Standard Operating Procedures (SOPs) adopted from the Wisconsin Department of Natural Resources (WDNR), as part of an Primary Quality Assurance Organization (PQAO) #1175, recognized by EPA. Additionally, data submitted in support of FCPC's proposed 2015 ozone designation for the years 2013-2015 meets EPA's designation data requirements by exceeding EPA's data completeness requirement in all three years with 97% or better, and WDNR's annual certification of FCPC data in accordance with 40 CFR 58.15, in letters to EPA dated April 30, 2014, April 24, 2015 and April 28, 2016, respectively (attached).

Designation Recommendation for FCPC Trust Lands

In a memo from Acting Assistant Administrator, Janet G. McCabe, to Regional Administrators dated February 25, 2016, guidelines are provided for states and tribes to submit recommended designations for the final 2015 ozone NAAQS rule (80 FR 65292, October 26, 2015). While tribes are not obligated to participate in the designation process, EPA has invited tribes to do so by expressing its intent to follow the same process for tribes to the extent practicable pursuant to section 301(d) of the CAA and the Tribal Authority rule, or TAR (63 FR 7254)¹. Additionally, McCabe's memo states, "Even absent TAS [Treatment-in-the-Same-Manner-as-a-State] for section 107(d) designation purposes, EPA may solicit air quality information and designations recommendations from tribes for their areas of Indian Country." This is consistent with the federal government's trust responsibility, Executive Order (EO) 13175, EPA's 1984

¹ EPA's Memorandum dated December, 4, 2008 from Deputy Assistant Administrator Robert J. Meyer's. {00528704.1}

Indian Policy, and its May 4, 2011 policy to consult with tribes on actions and decisions that affect their interests.

Therefore, FCPC respectfully requests that **FCPC trust lands located within Forest County** be designated separately from adjacent lands (designation preferences for FCPC lands located outside of Forest County are addressed below). However, under the PQAO partnership and the December, 2010 Air Monitoring Memorandum of Understanding between FCPC and WDNR, data collected at FCPC's regulatory monitoring site is shared with WDNR and should not preclude the State from using this same data to make designations of areas within its jurisdiction.

FCPC has read and is aware of the implications of separated designation included in EPA's 2011 McCabe memo, including responsibility for implementation of an EPA approved plan to reach attainment if the area is in non-attainment; the difficulty in demonstrating reasonable progress towards attainment with few emission sources on tribal lands; and the requirement that federal funding for projects meets general and transportation conformity with the area's approved implementation plan for designated as being in non-attainment or maintenance. FCPC air quality data indicates that FCPC lands within Forest County are in attainment for the 2015 ozone NAAQS, therefore these implications associated with separate designation do not apply at this time.

To meet EPA's request for additional submittals when requesting a separate tribal designation, in addition to this formal recommendation from the Tribe, FCPC has attached a map to document the areas of FCPC lands within Forest County for separate designation and concurrence with EPA's intent to include these lands in the 40 CFR Part 81 Table should EPA separately designate them.

EPA has stated that it will determine non-attainment area boundaries in designations based on five factors: air quality data, emissions and emissions-related data, meteorology, geography/topography, and jurisdictional boundaries.² The FCPC's ozone data demonstrates that FCPC trust lands within Forest County meet the 2015 ozone standard. In addition, there are no major sources of NOx and VOCs located on FCPC lands or within Forest County (figure 1), therefore there are no transport contributions to any downwind non-attainment areas. Consequently, analysis of the three remaining factors in the five-factor analysis is not necessary.

Figure 1. USEPA Ozone Designations Mapping Tool 2016-08-17
 (https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=6a89e7170dd147b1852ec11ccb3880e8)

1	(Emissions in tons/year)															
2	FIPS	State	County	NOx Fires	NOx Nonpoint	NOx Nonroad	NOx Onroad	NOx Point	NOx Total	VOC Fires	VOC Nonpoint	VOC Nonroad	VOC Onroad	VOC Po	VOC Tot	
3068	55035	WI	Eau Claire	2	673	494	2,577	127	3,874	37	8,085	520	1,223	171	9,987	
3069	55037	WI	Florence	27	77	93	168	0	365	490	6,033	2,403	86	19	9,030	
3070	55039	WI	Fond du Lac	4	888	825	2,416	642	4,775	41	4,605	819	1,228	388	7,082	
3071	55041	WI	Forest	5	120	126	321	8	580	100	8,927	1,630	167	0	10,824	
3072	55043	WI	Grant	10	1,684	607	1,217	3,695	7,214	141	9,304	698	615	218	10,976	
3073	55045	WI	Green	5	521	419	670	73	1,688	51	4,050	483	350	143	5,077	
3074	55047	WI	Green Lake	3	275	260	425	49	1,012	39	2,764	1,054	229	10	4,096	

EPA stated in its February 25, 2016 Memorandum, that attainment areas will be designated as unclassifiable/attainment. Specifically, once nonattainment areas and unclassifiable area boundaries have been determined, all remaining areas will fall under the unclassifiable/attainment designation. These include areas that are believed to not have contributed to nearby violations. Furthermore, footnote

² Attachment 3 of EPA's "Area Designations for the 2015 Ozone National Ambient Air Quality Standards" memo from Janet G. McCabe, February 25, 2016.
 {00528704.1}

2 on page 2 explains that "states can submit recommendations identifying areas as 'attainment". The FCPC monitoring data demonstrates that FCPC lands within Forest County are not in exceedance of the 2015 ozone NAAQS, and as **such, FCPC lands within Forest**

Design values are determined by averaging the fourth-highest maximum 8-hour average ozone concentration for three consecutive years. A monitoring site is classified as "in attainment" if the design value is less than or equal to 0.070 ppm. During the 3 year period, daily maximum 8-hour average ozone concentrations are required to be available for at least 90%, on average, of the days during the designated ozone monitoring season (April 15th – October 15th), with a minimum data completeness in any one year of 75% of the designated sampling days.

FCPC Trust Lands within Forest County

Ozone is monitored at the FCPC single air monitoring site located on Sugarbush Hill in the Lincoln Township within Forest County, 4.5 miles east of the City of Crandon. The data is collected in accordance with the requirements of 40 CFR Part 58, Appendix A.

The fourth-highest daily maximum 8-hour average ozone concentrations in 2013, 2014 and 2015 were 0.066, 0.068 and 0.061ppm respectively, resulting in a design value of 0.061 ppm for 2013-2015. (Source: EPA Ozone Mapping Tool). In addition, FCPC data completeness for the years 2013 through 2015 was 97% and greater. With values below the 2015 0.070 ppm standard and all other requirements met, the FCPC proposes an "attainment" designation for FCPC trust lands located within Forest County.

FCPC Trust Lands within Oneida, Oconto, Shawano, Fond du Lac and Milwaukee Counties

The FCPC does not operate ozone analyzers in Oneida, Oconto, or Shawano Counties, nor does WDNR. As such, the FCPC chooses not to make any recommendations for separate designations at this time for FCPC trust lands within these counties.

The FCPC does not operate analyzers in Milwaukee and Fond du Lac Counties either, however, the WDNR does. Preliminary 2013-2015 data indicates that Fond du Lac County should meet the 2015 ozone standard although Milwaukee County will not, and will likely be held accountable for transport contributions to ozone non-attainment in neighboring areas, including Ozaukee, Sheboygan, Manitowoc and Kewaunee Counties.

The FCPC makes no comment or recommendation regarding attainment designation of Milwaukee County under the State's jurisdiction, nor does it intend to propose separate designation of its trust lands within. However, in contrast to Milwaukee County's total emissions, the FCPC Milwaukee trust lands are not a significant source of VOC or NOx emissions that could contribute to ozone non-attainment for Milwaukee County or be considered as transport contribution to ozone non-attainment in neighboring and downwind counties previously identified. FCPC believes that the differences in contributions from individual jurisdictions of separate sovereigns within the County should be taken into account when considering responsibility for implementing plans to meet the NAAQS.

The FCPC would like to be involved in consultations and discussions with the USEPA and the State of Wisconsin as the designation process moves forward. Please feel free to contact Natalene Cummings, FCPC Air Resources Program Director at 715-478-7211 or natalene.cummings@fcpotawatomi-nsn.gov with any questions you might have.

Sincerely,



Harold Frank, Chairman
Forest County Potawatomi Community

Page 4

Attachments

Map of Tribal Lands

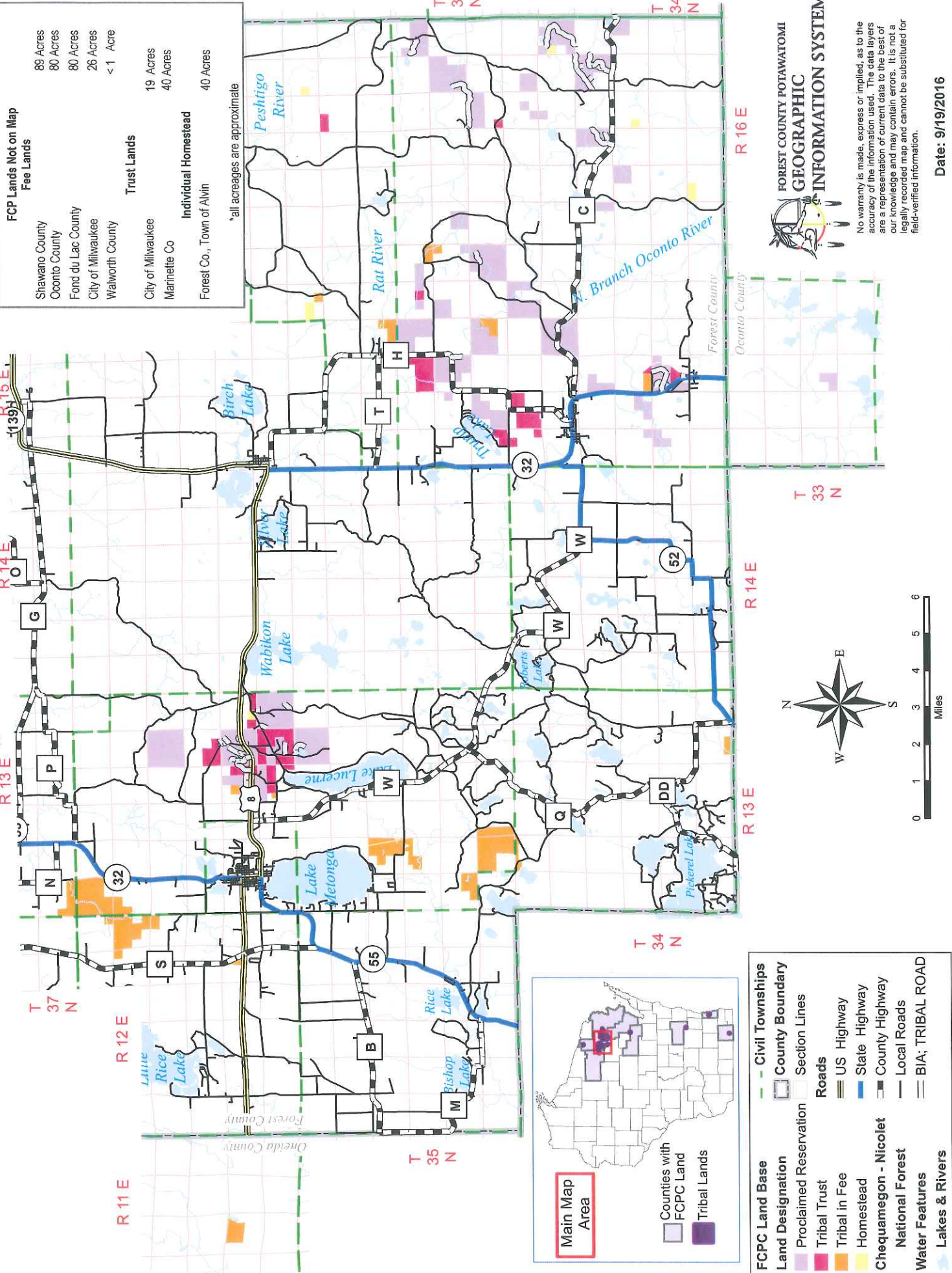
EPA Ozone Mapping Tools Spreadsheets

WDNR Years 2013-2015 Ambient Air Monitoring Data Certification letters

Cc:

Wisconsin Department of Natural Resources

Forest County Potawatomi Land Base



FCP Lands Not on Map

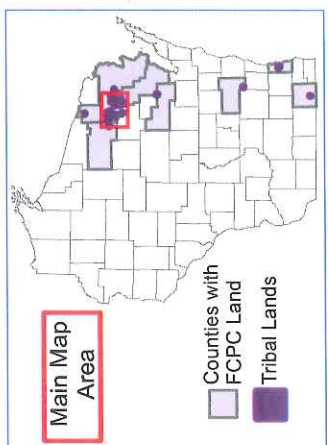
Fee Lands	Trust Lands	Individual Homestead
Shawano County	City of Milwaukee	Forest Co., Town of Alvin
Oconto County	City of Milwaukee	Marquette Co
Fond du Lac County	City of Milwaukee	40 Acres
City of Milwaukee	City of Milwaukee	19 Acres
Walworth County	Marquette Co	40 Acres
	Forest Co., Town of Alvin	40 Acres

*all acreages are approximate

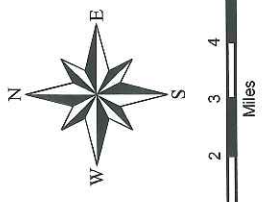


No warranty is made, express or implied, as to the accuracy of the information used. The data layers are a representation of current data to the best of our knowledge and may contain errors. It is not a legally recorded map and cannot be substituted for field-verified information.

Date: 9/19/2016



- FCPC Land Base**
 - Proclaimed Reservation
 - Tribal Trust
 - Tribal in Fee
 - Homestead
 - Chequamegon - Nicolet National Forest
- Land Designation**
 - Civil Townships
 - County Boundary
 - Section Lines
- Roads**
 - US Highway
 - State Highway
 - County Highway
 - Local Roads
 - BIA; TRIBAL ROAD
- Water Features**
 - Lakes & Rivers



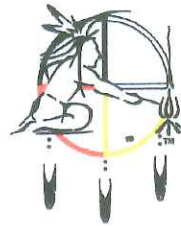
Forest County Potawatomi Tribal Lands

Index - Wisconsin South



This book is published as a guide to the community. All Tribal ownership contained herein were gathered from the Bureau of Indian Affairs (BIA) Title Status Reports (TSR) and information furnished by the FCP Legal Department. Due to continual purchase of property, it is impossible to guarantee 100% accuracy. The content of this book are not intended for any legal use in ownership, sales, trades or transfers of land. All acreages more or less.

Tribal lands are monitored by FCPC Tribal Security.



FOREST COUNTY POTAWATOMI
Keeper of the Fire

State	County	CBSA	Ozone NAA	EPA Region	POC	Local Site Name	Street Address	Latitude	Longitude	DV 2003-2005	DV 2004-2006	DV 2005-2007	DV 2006-2008	DV 2009-2010
Wisconsin	Forest			5		1 POTAWATOMI FIRE TOWER		45.563	-88.8088	0	0.068	0.071	0.068	

<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=6a89e7170dd147b1852ec11ccb3880e8>
 Pulled 8/2/2016
 Unit of measure = ppm

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711



April 30, 2014

Susan Hedman, Regional Administrator
USEPA Region 5, R19J
77 West Jackson Blvd.
Chicago IL 60604-3507

Subject: Year 2013 Ambient Air Monitoring Data Certification – Criteria Pollutants Network Data

Dear Ms. Hedman:

Enclosed you will find an AMP600 report dated April 30, 2014 that summarizes the data from Wisconsin's criteria pollutant network. Further, an AMP430 Quality Indicator and AMP450 Quicklook criteria parameters reports dated April 30, 2014 are included. The Wisconsin Department of Natural Resources (WDNR)'s Bureau of Air Management used these reports to review the 2013 air quality data that was submitted to the US EPA AQS database. These reports include data collected from January 1, 2013 through December 31, 2013.

The following list summarizes the reports used for certification.

1. AM600 – Data certification report for the criteria pollutants network.
2. AMP430 – Data completeness report for the criteria pollutants network
3. AMP450 – Quicklook criteria parameters

With the exception of the PM_{2.5} monitor at Milwaukee – College Ave. Park and Ride (55-079-0058) site, these reports complete the certification of the criteria network. We are waiting for review of data for this monitor to be completed by Region 5.

In compliance with paragraph (c) of 40 CFR 58.15(a), I certify that the ambient air data and quality assurance data submitted by the Wisconsin Department of Natural Resources (Reporting Organization 1175) are submitted completely to AQS and ambient monitoring data are accurate to the best of my knowledge, taking into consideration the quality assurance findings.

Per EPA's request, we are submitting this certification electronically. If you have any questions about this data, please contact Grant Hetherington at (608) 266-1552.

Sincerely,

Gail Good, Section Chief
Air monitoring Section
Bureau of Air Management

Attachments: AMP600 – Data Certification Report
AMP430 – Data Completeness Report
AMP450 – Quicklook criteria parameters

cc: Jesse McGrath - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
Marta Fuoco - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
Patricia Schraufnagel - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
David Lutz - USEPA-OQQPS/EMAD-MQAG (C339-02), RTP, NC - electronic
Bart Sponseller - AM/7 - electronic
Pat Stevens – AD/8 (letter only)
Grant Hetherington - AM/7

Attachments: AMP600 – Data Certification Report
AMP430 – Data Completeness Report
AMP450 – Quicklook criteria parameters

cc: Jesse McGrath - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
Marta Fuoco - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
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David Lutz - USEPA-OQQPS/EMAD-MQAG (C339-02), RTP, NC - electronic
Bart Sponseller - AM/7 - electronic
Pat Stevens – AD/8 (letter only)
Grant Hetherington - AM/7

Data Evaluation and Concurrence Report for Gaseous Pollutants

Certifying Year 2013

Certifying Agency Code Wisconsin Dept Of Natural Resources, Air Monitoring Section (1175)
Parameter Ozone (44201) (ppm)

PQAO Name Wisconsin Dept Of Natural Resources, Air Monitoring Section (1175)
QAPP Approval Date 10/01/2009

NPAP Audit Summary: Number of Valid Audits NPAP Bias Criteria Met
 8 -1.1053 Y

AQS Site ID	POC Monitor Type	Routine Data			Exceed. Count	Outlier Count	Perc. Comp.	One Point Quality Check		Annual PE		NPAP		Concur. Flag		
		Mean	Min	Max				Precision	Bias	Complete	Bias	Complete	QAPP Appr. Flag	Aqs Rec Flag	CA Rec Flag	Epa Eval.
55-003-0010	1 TRIBAL MONITOR	0.039	0.012	0.068	0	0	99	2.09	-2.21	100	-0.15	100	-1.12	Y	Y	S
55-009-0026	1 SLAMS	0.046	0.018	0.077	0	0	99	2.88	-3.62	100	2.85	100		Y	Y	S
55-021-0015	1 SLAMS	0.049	0.020	0.075	0	0	99	1.79	+/-1.49	100	-1.60	100		Y	Y	S
55-025-0041	1 SLAMS	0.048	0.018	0.072	0	0	99	1.94	+/-2.34	100	-0.91	100	-1.08	Y	Y	S
55-027-0001	2 SLAMS	0.044	0.016	0.232	1	0	98	2.51	+/-2.24	100	2.63	100		Y	Y	S
55-029-0004	1 SLAMS	0.046	0.016	0.086	0	0	98	1.20	-3.16	100	0.20	100		Y	Y	S
55-035-0014	1 SLAMS	0.046	0.024	0.069	0	0	99	1.73	+/-1.44	100	0.15	100		Y	Y	S
55-039-0006	1 SLAMS	0.047	0.020	0.076	0	0	100	3.52	-4.06	100	0.16	100		Y	Y	S
55-041-0007	1 TRIBAL MONITOR	0.041	0.016	0.067	0	0	96	1.63	+/-1.40	100	1.60	100		Y	Y	S
55-055-0009	1 SLAMS	0.049	0.021	0.088	0	0	100	0.74	-1.72	100	-1.33	100		Y	Y	S
55-059-0019	1 SLAMS	0.050	0.018	0.090	0	0	99	1.15	-3.18	93	0.00	100	-2.13	Y	Y	S
55-061-0002	1 SLAMS	0.049	0.019	0.085	0	0	99	0.98	-1.93	100	0.88	100		Y	Y	S
55-063-0012	1 SLAMS	0.046	0.015	0.068	0	0	99	1.00	-1.90	100	0.57	100		Y	Y	S
55-071-0007	1 SLAMS	0.049	0.018	0.088	0	0	99	0.55	-1.46	100	-0.72	100		Y	Y	S
55-073-0012	1 SLAMS	0.046	0.019	0.075	0	0	97	3.17	+/-2.54	100	-0.43	100		Y	Y	S
55-079-0010	1 SLAMS	0.045	0.016	0.078	0	0	99	1.82	+3.36	92	-1.22	100		Y	Y	S
55-079-0026	1 SLAMS	0.040	0.008	0.084	0	0	99	1.07	+/-0.90	100	3.24	100	-1.09	Y	Y	S
55-079-0085	1 SLAMS	0.050	0.023	0.087	0	0	95	2.08	-5.19	100	3.12	100		Y	Y	S
55-087-0009	1 SLAMS	0.047	0.019	0.076	0	0	99	2.37	-2.02	100	-1.69	100	0.00	Y	Y	S
55-089-0008	1 SLAMS	0.050	0.023	0.089	0	0	98	1.61	-2.20	100	-0.11	100	-2.63	Y	Y	S
55-089-0009	1 SLAMS	0.048	0.019	0.086	0	0	99	1.38	+/-1.50	100	-2.10	100		Y	Y	S
55-101-0017	1 SLAMS	0.048	0.024	0.077	0	0	99	1.76	-2.82	92	-1.20	100		Y	Y	S
55-105-0024	1 SLAMS	0.054	0.031	0.076	0	0	97	2.04	-2.18	100	0.23	100		Y	Y	S
55-105-0030	1 SLAMS	0.047	0.020	0.067	0	0	99	2.02	+/-1.69	100	0	0		Y	N	S

Submitter Comment: Site moved mid-season from 55-105-0024. Audit wa

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711



April 24, 2015

Susan Hedman, Regional Administrator
USEPA Region 5, R19J
77 West Jackson Blvd.
Chicago IL 60604-3507

Subject: Year 2014 Ambient Air Monitoring Data Certification – Criteria Pollutants Network Data

Dear Ms. Hedman:

Enclosed you will find an AMP600 data certification report dated April 24, 2015 that summarizes the data from Wisconsin's criteria pollutant network. The Wisconsin Department of Natural Resources (WDNR)'s Bureau of Air Management used this report to review the 2014 air quality data that was submitted to the US EPA AQS database. This report includes data collected from January 1, 2014 through December 31, 2014.

In compliance with paragraph (c) of 40 CFR 58.15(a), I certify that the ambient air data and quality assurance data submitted by the Wisconsin Department of Natural Resources (Reporting Organization 1175) are submitted completely to AQS and ambient monitoring data are accurate to the best of my knowledge, taking into consideration the quality assurance findings.

Per EPA's request, we are submitting this certification electronically. If you have any questions about this data, please contact Grant Hetherington at (608) 266-1552.

Sincerely,

Bart Sponseller
Deputy Division Administrator
Air, Waste and Remediation & Redevelopment Division

Attachments: AMP600 – Data Certification Report

cc: Jesse McGrath - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
Michael Compher - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
Pat Stevens – AD/8 (letter only)
Gail Good - AM/7 - electronic
Grant Hetherington - AM/7

Data Evaluation and Concurrence Report for Gaseous Pollutants

Certifying Year 2014

Certifying Agency Code Wisconsin Dept Of Natural Resources, Air Monitoring Section (1175)
Parameter Ozone (44201) (ppm)

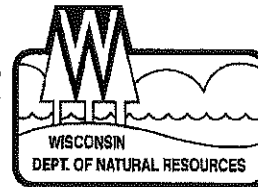
PQAO Name Wisconsin Dept Of Natural Resources, Air Monitoring Section (1175)
QAPP Approval Date 03/01/2003

NPAP Audit Summary: Number of Valid Audits 8 NPAP Bias 1.18056 Criteria Met Y

AQS Site ID	POC Monitor Type	Routine Data			Exceed. Count	Outlier Count	Perc. Comp.	One Point Quality Check		Annual PE Complete	Bias	NPAP PQAO Level Criteria	QAPP Appr. Flag	Aqs Rec Flag	Concur. Flag		
		Mean	Min	Max				Precision	Bias							Complete	Bias
55-003-0010	1 TRIBAL	0.038	0.011	0.067	0	0	97	1.62	+/-2.01	96	0.42	100	Y	N	N	Y	S
<p>Submitter Comment Updated QAPP documentation exists in draft form or informal documentation. Some changes have been made in operation and data validation procedures to reflect updates to EPA QA Handbook V.II, updates to CFR and current technology. This is primarily a documentation and recordkeeping issue. It is understood that updated QAPPs must be completed and approved in a timely fashion and resources will be dedicated to this purpose. It is WDNR's opinion that the data produced has been of acceptable quality based on internal evaluation, PEP/NPAP/TTP audits and TSAs that have been conducted. Information requested by Region V will be sent.</p>																	
55-009-0026	1 SLAMS	0.045	0.022	0.082	0	0	97	0.96	-1.84	92	2.18	100	Y	N	N	Y	S
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55-021-0015	1 SLAMS	0.047	0.021	0.081	0	0	99	0.97	+/-1.12	100	0.88	100	Y	N	N	Y	S
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55-025-0041	1 SLAMS	0.046	0.021	0.078	0	0	98	2.19	+/-2.42	92	2.03	100	Y	N	N	Y	S
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April 28, 2016

Susan Hedman, Regional Administrator
USEPA Region 5, R19J
77 West Jackson Blvd.
Chicago IL 60604-3507

Subject: Year 2015 Ambient Air Monitoring Data Certification – Criteria Pollutants Network Data

Dear Ms. Hedman:

Enclosed you will find an AMP600 data certification report dated April 28, 2016 that summarizes the data from Wisconsin's criteria pollutant network. The Wisconsin Department of Natural Resources (WDNR)'s Bureau of Air Management used this report to review the 2015 criteria air quality data that was submitted to the US EPA AQS database. This report includes data collected from January 1, 2015 through December 31, 2015.

In compliance with paragraph (c) of 40 CFR 58.15(a), I certify that the ambient air data and quality assurance data submitted by the Wisconsin Department of Natural Resources (Reporting Organization 1175) are submitted completely to AQS and ambient monitoring data are accurate to the best of my knowledge, taking into consideration the quality assurance findings.

One additional requested attachment includes a summary of 2015 data and QC completeness to address a finding from the 2015 Technical Systems Audit and a list of WDNR's Quality Assurance Project Plans (QAPPs).

Per EPA's request, we are submitting this certification electronically too. If you have any questions about this data, please contact Grant Hetherington at (608) 266-1552.

Sincerely,

Gail Good
Director
Air Management Program

Attachments: AMP600 – Data Certification Report
Summary of 2015 Data and QC Completeness and WDNR's Quality Assurance Project Plans

cc: Jackie Nwia - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
Michael Compher - USEPA Region 5, Air Monitoring Section (AR-18J) – electronic
Bart Sponseller – AM/7 (letter only)
Gail Good - AM/7 – electronic
Grant Hetherington - AM/7

Data Evaluation and Concurrence Report for Gaseous Pollutants

Certifying Year 2015

Certifying Agency Code Wisconsin Dept Of Natural Resources, Air Monitoring Section (1175)
Parameter Ozone (44201) (ppm)

PQAO Name Wisconsin Dept Of Natural Resources, Air Monitoring Section (1175)
QAPP Approval Date 03/01/2003

NPAP Audit Summary: Number of Passed Audits NPAP Bias Criteria Met
 5 2.34583 Y

AQS Site ID	POC Monitor Type	Routine Data			Exceed. Count	Outlier Count	Perc. Comp.	One Point Quality Check			Annual PE		NPAP		Concur. Flag				
		Mean	Min	Max				Precision	Bias	Complete	Bias	Complete	Bias	PQAO Level Criteria	QAPP Appr. Flag	Aqs Rec Flag	CA Rec Flag	Epa Concur	
55-003-0010	1 TRIBAL	0.039	0.014	0.068	0	0	97	4.15	+3.71	85	100	- 1.98	100	2.76	Y	N	N	Y	S
<p>Submitter Comment Updated QAPP documentation exists in draft form or informal documentation. Some changes have been made in operation and data validation procedures to reflect updates to EPA QA Handbook V.II, updates to CFR and current technology. This is primarily a documentation and recordkeeping issue. It is understood that updated QAPPs must be completed and approved in a timely fashion and resources will be dedicated to this purpose. It is WDNR's opinion that the data produced has been of acceptable quality based on internal evaluation, PEP/NPAP/TTP audits and TSAs that have been conducted.</p>																			
55-009-0026	1 SLAMS	0.046	0.019	0.085	0	0	99	1.86	+/-1.79	92	100	2.63	100	Y	N	N	Y	S	
<p>Submitter Comment Updated QAPP documentation exists in draft form or informal documentation. Some changes have been made in operation and data validation procedures to reflect updates to EPA QA Handbook V.II, updates to CFR and current technology. This is primarily a documentation and recordkeeping issue. It is understood that updated QAPPs must be completed and approved in a timely fashion and resources will be dedicated to this purpose. It is WDNR's opinion that the data produced has been of acceptable quality based on internal evaluation, PEP/NPAP/TTP audits and TSAs that have been conducted.</p>																			
55-021-0015	1 SLAMS	0.046	0.017	0.071	0	0	99	1.38	+/-1.49	100	100	- 0.79	100	Y	N	N	Y	S	
<p>Submitter Comment Updated QAPP documentation exists in draft form or informal documentation. Some changes have been made in operation and data validation procedures to reflect updates to EPA QA Handbook V.II, updates to CFR and current technology. This is primarily a documentation and recordkeeping issue. It is understood that updated QAPPs must be completed and approved in a timely fashion and resources will be dedicated to this purpose. It is WDNR's opinion that the data produced has been of acceptable quality based on internal evaluation, PEP/NPAP/TTP audits and TSAs that have been conducted.</p>																			
55-025-0041	1 SLAMS	0.047	0.015	0.072	0	0	99	1.11	+/-0.90	85	100	0.61	100	2.06	Y	N	N	Y	S
<p>Submitter Comment Updated QAPP documentation exists in draft form or informal documentation. Some changes have been made in operation and data validation procedures to reflect updates to EPA QA Handbook V.II, updates to CFR and current technology. This is primarily a documentation and recordkeeping issue. It is understood that updated QAPPs must be completed and approved in a timely fashion and resources will be dedicated to this purpose. It is WDNR's opinion that the data produced has been of acceptable quality based on internal evaluation, PEP/NPAP/TTP audits and TSAs that have been conducted.</p>																			
55-027-0001	2 SLAMS	0.043	0.014	0.076	0	0	99	1.78	+/-1.65	100	100	- 0.15	100	Y	N	N	Y	S	
<p>Submitter Comment Updated QAPP documentation exists in draft form or informal documentation.</p>																			

USEPA Region 5
SEP 30 2016
Office of the Regional Administrator