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March 13, 2020

Air Quality Modeling Group  
Mail Drop C404-03  
U.S. Environmental Protection Agency  
Research Triangle Park NC 27711

Subject: Draft Guidance for Ozone and Fine Particulate Matter Permit Modeling

Dear Mr. Bridgers:

The Wisconsin Department of Natural Resources (WDNR) appreciates the opportunity to comment on the U.S. EPA's "Draft Guidance for Ozone and Fine Particulate Matter Permit Modeling" dated February 10, 2020.

The stated purpose of the draft guidance is to reflect U.S. EPA's recommendations for how a stationary source seeking a Prevention of Significant Deterioration (PSD) permit may demonstrate that it will not cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS) for ozone (O<sub>3</sub>) and fine particulate matter (PM<sub>2.5</sub>) and the PSD increments for PM<sub>2.5</sub>. Considering the April 17, 2018, significant impact level (SIL) guidance and the April 30, 2019, modeled emission rates for precursors (MERPs) guidance, the draft modeling guidance will ensure consistency in dispersion modeling analyses across the country. WDNR encourages U.S. EPA to finalize the proposed modeling guidance.

Thank you for the opportunity to comment on this draft guidance. Please contact John Roth at [john.roth@wisconsin.gov](mailto:john.roth@wisconsin.gov), or at 608-267-0805 if you have any questions regarding these comments.

Sincerely,



Gail E. Good  
Director, Air Management Program  
Wisconsin Department of Natural Resources