

## Appendix

### **Door County – Rural Transport Classification**

Section 107(d)(1)(A)(i) of the Clean Air Act states that any area that does not meet the ozone standards, primary or secondary, should be designated as a nonattainment area. Thus to meet the requirements of the Act, Door County should be designated as a nonattainment area. However, it is requested that the Environmental Protection Agency (EPA) designate Door County as a “rural transport” nonattainment area for the following reasons:

- EPA has previously stated that Door County meets the rural transport area eligibility requirements of the Clean Air Act, Section 182(h). [Docket ID No. EPA-HQ-OAR-2007-0956]. There are two requirements to be eligible for this classification. First, an area must not be part of or adjacent to any part of a Metropolitan Statistical Area (MSA) or, where one exists, a Consolidated Metropolitan Statistical Area (CMSA). Second, sources of VOC and NO<sub>x</sub> emissions in the area must not make a significant contribution to the ozone concentrations measured in other areas.
- Door County is not in or adjacent to a Metropolitan Statistical Area (MSA) or Combined Metropolitan Statistical Area (CMSA).
- Based on 2005 emissions data from the Lake Michigan Air Director’s Consortium (LADCO), Door County only contributes 1.1% of VOC emissions and 0.6% of NO<sub>x</sub> emissions compared to the current Wisconsin ozone nonattainment counties and the current Chicago area ozone nonattainment counties.

### **Kenosha County Monitor**

Section 107(d)(1)(A)(i) of the Clean Air Act states that any area that does not meet the ozone standards, primary or secondary, should be designated as a nonattainment area. Thus to meet the requirements of the Act, Kenosha County, or some portion thereof, should be designated as a nonattainment area. The smallest portion of Kenosha County (i.e., Pleasant Prairie Municipality) should be designated as a nonattainment for the following reasons:

- The Chiwaukee ozone monitor in Kenosha County is located less than 1 mile from the Illinois border in Pleasant Prairie Municipality.
- All major VOC point sources (> 100 tons/year) in Kenosha County were located in Pleasant Prairie Municipality based on 2007 emissions data (see figure).
- The largest NO<sub>x</sub> point source in Kenosha County was located in Pleasant Prairie Municipality based on 2007 emissions data (see figure). This source, We Energies – Pleasant Prairie Station, accounted for approximately 83% of the total NO<sub>x</sub> emissions from major sources in Kenosha County.
- The exceedance of the ozone standard at the Chiwaukee ozone monitor in Kenosha County is most likely due to transport from areas outside the state of Wisconsin. On days when the 1-hour ozone concentration exceeded 75 parts per billion (ppb), the observed wind speed at the Chiwaukee ozone monitor had a southerly component 89.3% of the time from 2006 through 2008. Also, air quality modeling data from the Lake Michigan Air Director’s Consortium (LADCO) shows that the Milwaukee nonattainment counties (Kenosha, Milwaukee, Ozaukee, Racine, Waukesha, and

Washington) and the remainder of Wisconsin only contribute 4.1% and 1.6%, respectively, of the attributable ozone concentration at the Chiwaukee ozone monitor when the 1-hour ozone concentration exceeds 75 ppb. The Chicago nonattainment counties contribute 39.6% of the attributable ozone concentration.

- Based on 2005 emissions data from the Lake Michigan Air Director's Consortium (LADCO), the Chicago nonattainment counties contribute approximately 75 to 80% of the total NO<sub>x</sub> and VOC emissions compared to Wisconsin's current ozone nonattainment counties.

**Major Sources (> 100 tons/year) of NO<sub>x</sub> and/or VOC in Kenosha County**

