

Grand Rapids Area
Chamber of Commerce

October 1, 2008

DOCKET #OAR 2007-0562
U.S. Environmental Protection Agency
Mail Code: 6102T
1200 Pennsylvania Ave, NW
Washington, DC 20460

Via e-mail: A-and-R-Docket@epa.gov
Via Fax: 202-566-1741

Subject: DOCKET # OAR-2007-0562 - Request to Reconsider the Designation of Kent County and Ottawa County Michigan with Regards to the New PM_{2.5} Air Quality Standard

The Grand Rapids Area Chamber of Commerce, representing over 3,000 members, requests that the U.S. Environmental Protection Agency reconsider its proposed intention to designate both Kent and Ottawa Counties (Michigan) as non-attainment with regards to the new PM_{2.5} air quality standard. Resolving this issue is critical to the economic viability of our area. The proposed non-attainment designation is contrary to the scientific evidence and the dynamic consideration in our area of the State.

There are several compelling reasons for the Chamber's request; not the least of which is the actual (older) air quality data which indicates Ottawa County is in attainment with the new standard and further indicates that Kent County is only 1 part per million over the standard. Emission reduction activities continue in both counties and more recent data appears to indicate that both counties **are in attainment** with the new standard. The Chamber and the Michigan DEQ are in agreement that the data from 2005 represents an atmospheric anomaly and more recent data continue to show improvements in air quality. At a minimum, the EPA should use the most recent data available when making its final designations.

If the counties are designated as non-attainment, the action would have far reaching and potentially devastating economic impacts on the Western Michigan economic outlook, severely limiting economic recovery for our region.

The Chamber was informed the EPA set aside actual data demonstrating compliance with the standard at the Ottawa County base of the J.H. Campbell plant, which is a large coal fired

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electrical generating site in West Olive Township. EPA has not considered the recent and extensive controls placed on this coal fired facility.

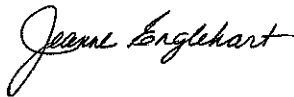
Data for Western Michigan indicates the makeup of the PM_{2.5} particles in our geographic area is largely comprised of earth-borne/crustal matter. Actions by EPA do not appear consistent with the atmospheric anomaly and the speciation of the particulate matter and thus should be revisited and considered when determining the attainment status of both Kent and Ottawa Counties.

The recent action by EPA to disregard numerical data and designate rural Ottawa County as non-attainment is illogical and will require Michigan to develop source controls that may not properly abate the primary pollutant source. Especially considering that a coal fired source was part of the consideration for overriding the actual air quality data in Ottawa County. If the science is accurate, the deployment of stationary and combustion controls on Western Michigan sources will not address the single largest contributor to fine particulate pollution in our region. We continue to question the benefits of designating these counties as non-attainment.

Designating Kent and Ottawa counties as non-attainment may also lead to the appearance that EPA is not confident in the attainment NSR permitting program (also known as prevention of significant deterioration (PSD)). PSD permitting is in place and will continue to control large sources providing controls that promote continued improvement in our region.

The Chamber appreciates EPA's consideration of these comments and the opportunity to express our heightened concern for the use of sound public policy based on adequate scientific principles, sound economic consideration and practical regulatory application.

Respectfully submitted:



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Grand Rapids Area Chamber of Commerce



Jeff Pfost
Chair, Environmental Affairs Committee
Grand Rapids Area Chamber of Commerce

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