



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

AUG 22 2017

The Honorable Richard D. Snyder
 Governor
 Office of the Governor, State of Michigan
 P.O. Box 30013
 Lansing, Michigan 48909

REPLY TO THE ATTENTION OF:

Dear Governor Snyder:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's intended designations for all of the remaining areas in Michigan for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). The designations for this NAAQS are an important part of the EPA's commitment to a clean, healthy environment. These intended designations are a response to designations-related recommendations and information your state submitted in letters dated June 1, 2011, September 18, 2015, and January 13, 2017, and February 14, 2017.

On July 25, 2013, EPA designated certain areas in 16 states as nonattainment,¹ but did not at that time designate other areas. Additional areas were designated on June 30, 2016,² and November 29, 2016.³ Pursuant to a March 2, 2015, court-ordered schedule,⁴ the agency must complete the remaining SO₂ designations by two specific deadlines: December 31, 2017, and December 31, 2020.⁵ Accordingly, this letter is to notify you of EPA's intentions regarding your state's recommended designations for all the remaining undesignated areas in Michigan.

After carefully considering Michigan's recommendations and all available information, including any air dispersion modeling analysis and monitoring data, EPA agrees with your recommendations and intends to designate the following areas as indicated below. EPA regulations for implementing the SO₂ NAAQS require Michigan to characterize SO₂ air quality in each of these listed areas. EPA intends to designate each listed area as a separate unclassifiable/attainment area, as indicated.⁶

Intended Unclassifiable/Attainment Area	Included Counties
Alpena County	Entirety of Alpena County
Delta County	Entirety of Delta County

¹ A portion of Wayne County was designated as nonattainment in this action.

² In this action, EPA designated a portion of St. Clair County as nonattainment, and Bay, Eaton, Ingham, Marquette, Monroe, and Ottawa Counties as unclassifiable/attainment.

³ This action only affected Texas.

⁴ *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

⁵ Michigan does not have any areas affected by the 2020 deadline.

⁶ Our intended designated areas include all areas of Indian country located in each of the indicated areas.

The enclosure to this letter provides the information that supports the intended designation decisions for these areas in Michigan.⁷

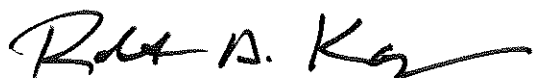
In addition, the EPA intends to designate as unclassifiable/attainment all remaining areas of Michigan that were not required to be characterized and for which EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas are also included in the enclosure, in the section titled, "Technical Analysis for the Remainder of Michigan."

If you or your staff have additional information that EPA should consider prior to finalizing these designations, please submit it as soon as possible but no later than October 23, 2017. You may submit additional information by sending it to EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at www.regulations.gov, and sending a copy to EPA Region 5. EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on EPA's intended designations.

EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. Upon the completion of this designation action, there will be no remaining areas in Michigan to be designated.

We share your goal to provide cleaner air for citizens in your state. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO₂ NAAQS. For additional information regarding designations under the SO₂ NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to call me, or have your staff contact Ed Nam of my staff at 312-353-2192 or Nam.Ed@epa.gov.

Sincerely,



Robert A. Kaplan
Action Regional Administrator

Enclosure

Cc C. Heidi Grether, Director, Michigan Department of Environmental Quality
Lynn Fiedler, Director, Air Quality Division, Michigan Department of Environmental Quality

⁷ The enclosure is Chapter 19 of the Technical Support Document for the designations EPA plans to complete by December 31, 2017, that addresses areas in Michigan. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>.