

JAN 13 2017



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREETHER
DIRECTOR

January 13, 2017

Mr. John Mooney
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (AR-18J)
Chicago, Illinois 60604-3507

Dear Mr. Mooney:

The Michigan Department of Environmental Quality (MDEQ) is submitting its recommended designations for the 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) as required by the Data Requirements Rule (DRR). These recommendations are based on the dispersion modeling of two SO₂ sources identified to the United States Environmental Protection Agency (USEPA) in a letter from me dated January 15, 2016. Specifically with this submittal, the MDEQ is recommending the counties of Delta and Alpena be designated as attainment.

This attainment recommendation was determined using dispersion modeling, emissions-related data, and meteorology as outlined in the USEPA's guidance memorandum dated March 20, 2015. However, the modeling for the Lafarge Cement facility is based on two years and eleven months of data, not the required full three years of actual emissions. Lafarge Cement will submit their December 2016 data to the MDEQ in late January 2017, and the MDEQ will re-run the model using the three full years of data; 2014-2016. The results will be forwarded to the USEPA as an addendum to this submittal in February 2017.

A description of the MDEQ's analysis is provided in the enclosed Support Document for Sulfur Dioxide Designation Recommendations for the 2010 SO₂ NAAQS.

If you have additional questions regarding this matter, please contact Mr. Robert Irvine, Air Quality Division, at 517-284-6749; irviner@michigan.gov; or MDEQ, P.O. Box 30260, Lansing, Michigan 48909-7760; or you may contact me.

Sincerely,

Lynn Fiedler, Division Director
Air Quality Division
517-284-6773

cc: Mr. Robert Irvine, MDEQ

Support Documentation for
Sulfur Dioxide Designation Recommendations
for the 2010 SO₂ NAAQS



Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909-7760

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Support Documentation for Sulfur Dioxide Designation Recommendations for the 2010 SO₂ NAAQS

Executive Summary

The Michigan Department of Environmental Quality (MDEQ) is submitting its recommended designations for the 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). These recommendations are based on the dispersion modeling for two SO₂ sources, which are subject to the United States Environmental Protection Agency (USEPA) Data Requirements Rule (DRR) because their emissions are greater than 2,000 tons per year. These facilities, Escanaba Paper in Escanaba and Lafarge Cement in Alpena, were identified in a letter dated January 15, 2016, to the USEPA, from Lynn Fiedler, MDEQ, Air Quality Division. The MDEQ is recommending attainment for the counties of Delta and Alpena. A description of the MDEQ's analysis for the attainment areas is provided in this document.

Introduction

The USEPA revised the primary NAAQS for SO₂ on June 2, 2010. This new, short-term standard is based on the 3-year average of the 99th percentile of the yearly distribution of 1-hour daily maximum concentrations. The level was set at 75 parts per billion (ppb). In July 2013, the USEPA identified areas in 16 states as nonattainment and expressed their intent to address designations for the remainder of the country in future actions.

On March 2, 2015, a consent decree was reached between the USEPA, the Sierra Club, and the Natural Resources Defense Council to resolve litigation concerning the deadline for completing designations. The first deadline was July 2, 2016. The second deadline was for stationary sources which fell under requirements of the August 10, 2015, DRR. Under this rule, designations had to be made for areas having sources that emit more than 2,000 tons per year of SO₂. State designation recommendations for these areas must be submitted to the USEPA by January 13, 2017. On March 20, 2015, the USEPA updated guidance to the states on designating areas. Areas were designated as either attainment, nonattainment, or unclassifiable.

Michigan Impacts

Two facilities have been identified as falling within the emissions levels referenced in the DRR:

- Escanaba Paper Company in Escanaba (Delta County), and;
- Lafarge Cement facility in Alpena (Alpena County).