

Update to the Michigan Sulfur Dioxide State Implementation Plan for the St. Clair County Nonattainment Area – Emission Inventory



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ENVIRONMENT, GREAT LAKES, AND ENERGY

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Update to the Michigan Sulfur Dioxide State Implementation Plan for the St. Clair County Nonattainment Area – Emissions Inventory

Introduction

Section 172(c)(3) of the Clean Air Act (CAA) requires each state with a nonattainment area to submit a base year inventory to the United States Environmental Protection Agency (USEPA). This State Implementation Plan (SIP) revision addresses the requirement for the sulfur dioxide (SO₂) nonattainment area in a portion of St. Clair County, Michigan.

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) submitted a Clean Data Determination (CDD) to the USEPA for the SO₂ nonattainment area in St. Clair County in July of 2020 in place of a complete SIP revision submittal.

The CDD is based on three consecutive years of SO₂ monitoring data showing no violations of the 1-hour SO₂ standard. Submitting a CDD in lieu of a complete SO₂ SIP suspends certain CAA requirements, including an attainment demonstration and contingency measures. However, the CAA requirement for submitting a base year inventory remains. For St. Clair County, a sanction clock remains in effect until the emissions inventory is submitted to the USEPA.

EGLE modeling has shown that upon retirement of the St. Clair Power Plant in 2022, EGLE will be able to demonstrate, through monitoring and modeling, that the area is attaining the SO₂ standard. EGLE will then prepare and submit to the USEPA, a request for redesignation to attainment of the St. Clair SO₂ nonattainment area.

EGLE also clarifies that Michigan has a fully approved Nonattainment New Source Review Program. The program is set forth in Part 19 of the Michigan SIP (R 336.2901 through R 336.2908). This program was approved by the USEPA into the SIP on December 16, 2013 ([78 FR 76064](#)), and addresses nonattainment permitting requirements for SO₂ and other pollutants.

Clean Air Act Section 172(c)(3)

EGLE is proposing to include the emission inventory contained in this document as a revision to the Michigan SIP to comply with the CAA Section 172(c)(3) requirement for an SO₂ nonattainment area base year emission inventory.

The CAA Section 172(c)(3) governs general nonattainment plan inventories and states:

Such plan provisions shall include a comprehensive, accurate, current inventory of actual emissions from all sources of the relevant pollutant or pollutants in such area, including such periodic revisions as the Administrator may determine necessary to assure that the requirements of this part are met.

SO₂ Base Year Emissions Inventory

The nonattainment designation for St. Clair County was finalized by the USEPA in 2016, based on data for the years 2014 through 2016. Therefore, 2014 is being used as the base year inventory for this SIP submittal. The SO₂ inventory is comprised of actual emissions from the two large SO₂ sources in the nonattainment area, DTE's Belle River and St. Clair coal-fired power plants.

Actual Belle River and St. Clair PP SO₂ Emissions, 2014

| Belle River Power Plant | 2014 (tons) |
|----------------------------------|--------------------|
| Unit 1 | 11,691 |
| Unit 2 | 12,775 |
| Auxiliary Boiler Stack | 0.00 |
| Diesel Gen. No. 11-1 | 0.00 |
| Diesel Gen. No. 11-2 | 0.00 |
| Diesel Gen. No. 11-3 | 0.00 |
| Diesel Gen. No. 11-4 | 0.00 |
| Diesel Gen. No. 11-5 | 0.00 |
| CTG No. 12-1 | 0.21 |
| CTG No. 12-2 | 0.25 |
| CTG No. 13-1 | 0.28 |
| East China CTG No. 1 | 0.01 |
| East China CTG No. 2 | 0.01 |
| East China CTG No. 3 | 0.01 |
| East China CTG No. 4 | 0.01 |
| | |
| St. Clair Power Plant | 2014 (tons) |
| Unit 1 | 2,493 |
| Unit 2 | 2,627 |
| Unit 3 | 2,518 |
| Unit 4 | 2,600 |
| Unit 5 | 0 |
| Unit 6 | 7,970 |
| Unit 7 | 9,245 |
| CTG No. 11-1 | 0.01 |
| Diesel Gen. No. 12-1 | 0.00 |
| Diesel Gen. No. 12-2 | 0.00 |
| | |
| | |
| Total (both power plants) | 51,920 |

Note – Two other facilities located in the nonattainment area had total SO₂ emissions in 2014 totaling 1,632 tons. By 2016, SO₂ emissions at the two facilities were reduced to under 2 tons total because fuels were permanently switched from coal to gas.

Title 40, of the Code of Federal Regulations, Part 51, Appendix V Requirements
40 CFR Part 51, Appendix V, contains requirements EGLE must follow to revise the SIP. The applicable requirements and EGLE's fulfillment of them are as follows:

1. Formal Request

Appendix V requires all SIP submittals contain a formal letter of submittal from the governor or the governor's designee requesting the USEPA approval of the SIP revision.

A letter dated July 3, 2019, from Governor Gretchen Whitmer to the USEPA, Region 5, delegates authority from the Governor to EGLE's Director to make any SIP submittal, request, or application under the CAA. This letter was submitted to the USEPA on July 30, 2019, for inclusion in the Michigan SIP, and is available upon request. This delegation of authority and the cover letter that is included with this SIP submittal to the USEPA satisfy the formal request requirement.

2. Necessary Legal Authority

Appendix V requires states submit evidence the State has the necessary legal authority under state law to adopt and implement the requested SIP revision.

Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended, and Executive Reorganization Order 2011-1 provide EGLE with the legal authority under state law to implement and enforce the provisions of the Michigan SIP. A copy has been submitted to the USEPA through previous SIP submittals and is available upon request.

3. Sufficient Public Notice

Appendix V requires the State to submit evidence that public notice was given of the proposed change consistent with procedures approved by the USEPA, including the date of publication of such notice.

An opportunity for public comment and hearing will be provided as required by Appendix V. A copy of the public notice for this SIP revision is included in Attachment A.

4. Valid Public Hearing

Appendix V requires the State to submit a certification that a public hearing, if held, was held in accordance with the information provided in the public notice and the State's Administrative Procedures Act.

EGLE will provide an opportunity for a public hearing upon request as stated in the public notice (Attachment A). The AQD did/did not receive any requests for public hearings by the stated date in the public notice, therefore the AQD held/canceled the public hearing.

5. Public Comments

Appendix V requires the State to compile any public comments and the State's responses to them in the SIP submittal.

EGLE will address this requirement upon completion of the comment period.

ATTACHMENT A

Public Notice Documents



Public Comment Period for Revisions to the Michigan State Implementation Plan

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) opened a public comment period for revisions to the Michigan State Implementation Plan (SIP) on March 29, 2021, which will remain open until 9:00 p.m. EDT on April 27, 2021. The purpose of the public comment period and virtual public hearing, if requested, are to allow all interested parties an opportunity to comment on the proposed SIP revision.

Proposed SIP Revision:

- Emission Inventory for the sulfur dioxide National Ambient Air Quality Standard (NAAQS) nonattainment area in a portion of St. Clair County.

In the proposed SIP revision, EGLE is demonstrating compliance with the requirement for a sufficient emissions inventory to comply with the Clean Air Act.

The public is encouraged to [review the proposed SIP revision](#) and present comments through the end of the public comment period. All statements received during the public comment period will be considered by EGLE's Air Quality Division (AQD) prior to submitting the SIP revision to the United States Environmental Protection Agency. Once all comments are considered, EGLE may submit the SIP revision as written, submit it with minor changes, or make major changes that require an additional public comment period.

Submitting Comments:

There are several ways to submit comments on the proposed SIP revisions.



Email your comment to IrvineR@Michigan.gov. Please include "Comments on SIP Revision" in the subject line.



Mail your comment to Robert Irvine, Michigan Department of the Environment, Great Lakes, and Energy (EGLE), Air Quality Division, SIP Development Unit, P.O. Box 30260, Lansing, Michigan 48909-7760.



At a public hearing, if held.

If requested in writing by April 20, 2021, a virtual public hearing will be held on April 27, 2021, at 1:00 p.m. Information on whether the hearing is requested and how to attend will be posted on at Michigan.gov/Air, choose "Public Comment" and then "Air Quality Rules and State Implementation Plans". If requested, the virtual public hearing will be preceded by an informational session.

Individuals without internet access and who are interested in receiving printed copies of the documents related to the proposed SIP revision or who need accommodations or other assistance to effectively participate in the hearing should contact Lorraine Hickman by April 13, 2021, at 517-582-3494 or HickmanL@Michigan.gov.

This public notice is given in accordance with federal regulations for the SIP.

NOTE: The Department of Environment, Great Lakes, and Energy (EGLE) has closed its offices and other facilities to visits from the public to help mitigate the spread of COVID-19. Necessary public meetings/hearings will be postponed to the extent possible or held virtually. When held virtually, every attempt will be made to accommodate and include individuals from diverse groups, including, but not limited to translation for those with limited English proficiency and provide call in numbers for those without internet access. Other options will also be considered on a case-by-case basis.

Michigan's Environmental Justice Policy promotes the fair, non-discriminatory treatment and meaningful involvement of Michigan's residents regarding the development, implementation, and enforcement of environmental laws, regulations, and policies by this state. Fair, non-discriminatory treatment intends that no group of people, including racial, ethnic, or low-income populations, will bear a disproportionately greater burden resulting from environmental laws, regulations, policies, and decision-making. Meaningful involvement of residents ensures an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health.