



MICHIGAN DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

---

# 2015 Ozone Planning Overview

Air Quality Division

Tom Shanley

Air Quality Evaluation Manager

# Ozone Background

- USEPA sets air quality standards based on latest health studies. In 2015, they lowered the 8-hour ozone standard from 75 to 70 ppb.
- Area Classifications:
  - Unclassifiable, attainment, nonattainment status
  - An area is classified as nonattainment if it has an ozone concentration above federal air quality standards based on the average of the 4<sup>th</sup> high monitoring number over a 3-year period.

$$\text{Design Value} = \frac{(2014 + 2015 + 2016)}{3 \text{ years}}$$

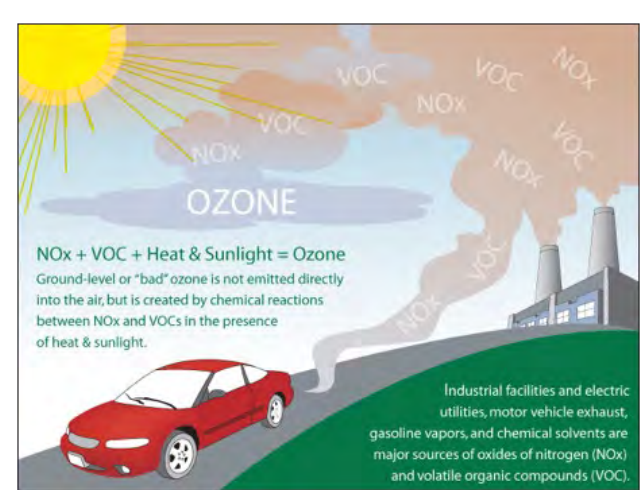
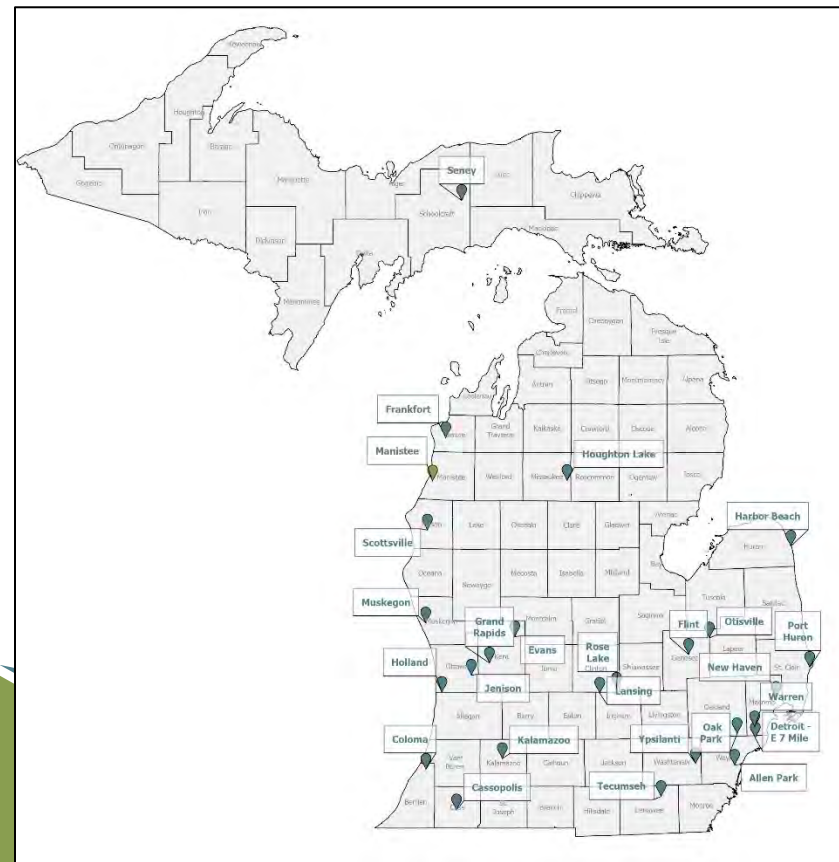
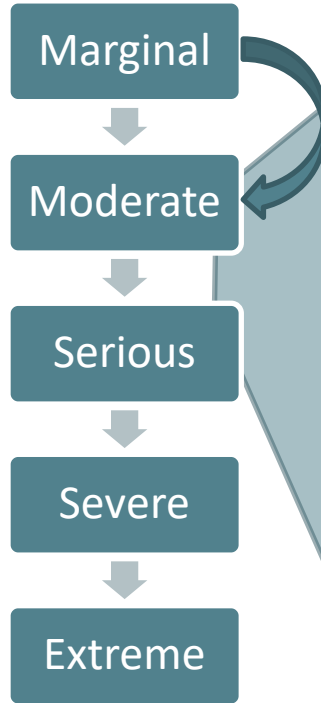


Image source: S.C. Department of Health and Environmental Control



# Reclassification ('Bump-up') Update



CAA Requirement	Marginal	Moderate
New Source Review Offsets	1 to 1.1	1 to 1.15
Attainment Date	3 years (2021)	6 years (2024)
VOC and NOx RACT (Reasonably Available Control Technology)	No	Yes
15% VOC Reasonable Further Progress Reductions	No	Yes
Basic Inspection & Maintenance Program	No	Yes <i>*Not West MI</i>

# Part 6 VOC Rules – Major Updates, Generally

- Exemption thresholds:
  - New coating rules (CTG threshold) = 15 lbs/day or 3 tpy (per line)
- More stringent limits for coatings, adhesives, solvents, etc.
- Additional options for meeting limits
  - Lbs/gal coating VOC
  - Lbs/gal solids VOC
  - Combination of low use coatings and controls equivalent to VOC emission rates
  - 90% overall control efficiency of VOCs
- Addition of work practices
- Updated Consumer Products Rule (R660)
  - OTC Model rule
  - Phase 2 to Phase 4
  - Additional products, tightening of some covered products
  - Used by many other states
- Addition of Architectural Industrial Maintenance (AIM) Coatings Rule
  - OTC Model Rule
  - From no rule to Phase 2
  - Used by other states

# Part 6 VOC Rules Timeline (past)

- **Fall 2019:** Initial stakeholder engagement
  - Semi-regular meetings since
- **Late 2021 – current:** rule language drafted in earnest
  - Informal drafts shared with stakeholders and revised based on feedback
- **April 2022:** Formal rulemaking started with draft rules complete
- **August 2022:** Environmental Rules Review Committee
- **Sept – Oct 2022:** Formal public comment / hearing

# Part 6 VOC Rules Timeline (future)

- **December 15:** Environmental Rules Review Committee (Round 2)
- **Dec. – Feb:** Legislative Service Bureau (LSB) and Michigan Office of Administrative Hearings and Rules (MOAHR) review (up to 2 months)
- **January – March:** Joint Committee on Administrative Rules (JCAR)
  - 15 Joint Session Days (2-3 months?)
- **Late winter / spring:** Final Promulgation of Part 6

# Part 8 NOx Rules Timeline

- **Fall 2019:** Initial stakeholder engagement
  - Semi-regular meetings since
- **Summer 2022 – current:** Rule language drafted in earnest
  - Informal drafts shared with stakeholders and revised based on feedback
- **December 2022:** Formal rulemaking started as draft rules are being finalized
- **Yet to do:** ERRC, Formal Public Comment, Revisions based on comments received, LSB / MOAHR review, JCAR
- **Mid to Late 2023:** Promulgation target

# Rules Outreach

- Robust stakeholder involvement
- Public Notice and Comment
- Broad and targeted communications in 2023
  - High-level outreach material developed
  - Webpage updates
  - Leverage district staff communications
  - GovDelivery messaging
  - Targeted email
- Help from industrial associations and consultants is welcome
- What else can we do to get the word out?



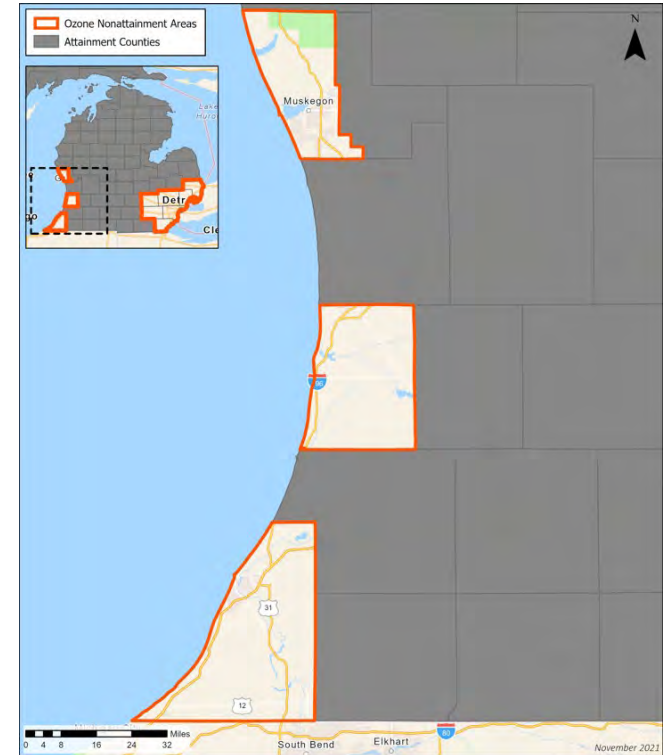
# West Michigan Planning

- Reclassification effective November 7, 2022
- Nonattainment SIP submittal in first half of 2023 (revised after all elements are in place)
  - VOC / NO<sub>x</sub> RACT
  - Reasonable Further Progress
    - Consumer Products & AIM rules
  - Contingency measures
  - Attainment Demonstration

Marginal

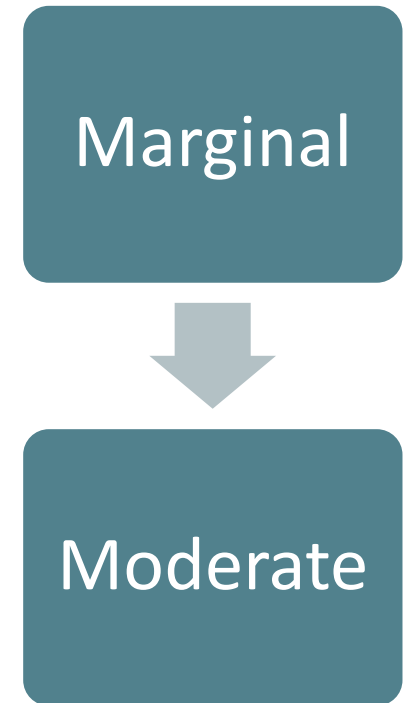


Moderate



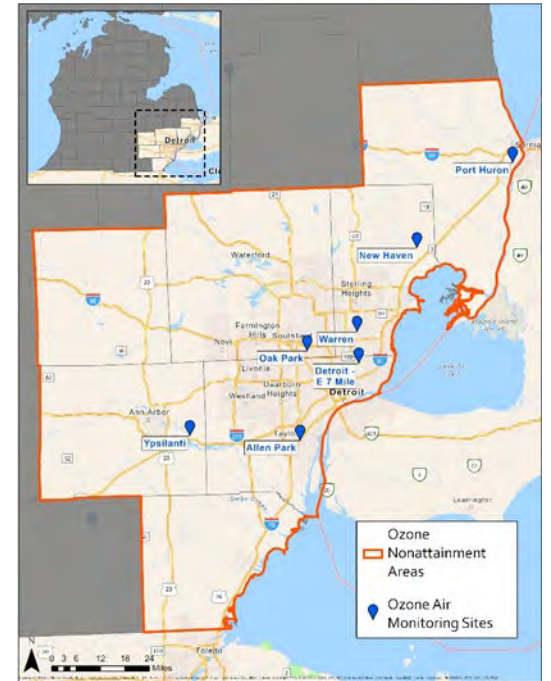
# Southeast Michigan Planning

- Reclassification Federal Register Notice expected in January 2023
- Moderate nonattainment SIP submittal in 2023 (required if not redesignated)
  - VOC / NO<sub>x</sub> RACT
  - Reasonable Further Progress
    - VOC RACT, Consumer Products & AIM rules
  - Contingency measures
  - Attainment Demonstration
  - Vehicle Inspection and Maintenance (I/M) program
    - Required implementation by 2026?



# Status of Southeast Michigan

- Federal Register notice of reclassification to moderate expected in January
- Redesignation pending with EPA (based on '19 – '21 data)
- Tentative violation based on preliminary data in July 2022
  - Redesignation paused pending validation of data
- Exceptional Event evaluation / demonstration
  - If submitted and EPA concurs, redesignation could proceed



# Helpful Links

- EGLE AQD SIP Ozone Nonattainment Webpage  
<https://www.michigan.gov/egle/about/organization/air-quality/state-implementation-plan/ozone-nonattainment>
- EGLE AQD air monitor sites and nonattainment area map  
<https://egle.maps.arcgis.com/apps/webappviewer/index.html?id=9a4c80a5c7fa4088971757504a3c0ba1>
- Pending Part 6 rule revisions  
<https://ars.apps.lara.state.mi.us/Transaction/RFRTransaction?TransactionID=1377>
- Federal Register: Reclassification of Areas Classified as Marginal for the 2015 Ozone National Ambient Air Quality Standards  
<https://www.govinfo.gov/content/pkg/FR-2022-10-07/pdf/2022-20460.pdf>

# Questions

---

Thank you!

Tom Shanley

Air Quality Evaluation Manager

[ShanleyT@Michigan.gov](mailto:ShanleyT@Michigan.gov)

517-643-3526