



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

November 3, 2021

Via email

Dear Stakeholders:

In March and April 2021, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), posted Public Notice and an opportunity for public comment regarding two proposed Wildfire Exceptional Event Demonstrations for Ground-Level Ozone in Western Michigan 2015 Ozone Nonattainment Areas of Allegan, Berrien, and Muskegon Counties. The proposed demonstrations provided a technical analysis suggesting that wildfire plumes originating from Arizona (June 2020) and California (August 2020) adversely affected ozone in a regulatorily significant way at the Allegan, Berrien, and Muskegon County monitors, and proposed the June 17-20, 2020, and August 26, 2020, data be excluded from regulatory determinations.

While EGLE was reviewing and considering the two letters commenting on the proposed demonstrations, ambient monitors in the nonattainment areas in west Michigan recorded several elevated 8-hour ozone concentrations in May and June 2021. The Allegan and Muskegon monitors recorded several elevated concentrations that resulted in each monitor's design values exceeding the 2015 ozone National Ambient Air Quality Standard (NAAQS) regardless of whether data from the proposed exceptional events are excluded from regulatory determinations. Since the associated nonattainment areas would continue to violate the NAAQS and the areas currently no longer qualify for redesignation to attainment, the regulatory significance of the proposed 2020 exceptional events has evaporated.

In February 2021, regarding the Chicago-Naperville, IL-IN-WI 2008 ozone nonattainment area, the Illinois Environmental Protection Agency (IEPA) submitted to the United States Environmental Protection Agency (USEPA) an exceptional events demonstration for June 18 and 19, 2020, seeking to exclude the ozone measurements at their Northbrook Water Plant Monitor from regulatory decisions for those days. On July 30, 2021, the USEPA informed IEPA of their nonconcurrency with IEPA's submitted exceptional event demonstration. It is important to note that west Michigan's proposed exceptional events demonstrations include the June 18 and 19, 2020 dates. Each of the three west Michigan nonattainment areas would need the USEPA to concur with the June 17-20 exceptional events demonstration to qualify for their proposed respective regulatory action. In particular, the Berrien monitor would not qualify for redesignation if the USEPA does not concur with the June 17-20, 2020 demonstration. Our proposed exceptional events demonstration for June 17-20, 2020, largely used the same analyses as IEPA's Northbrook demonstration.

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The AQD has reviewed the USEPA's Technical Support Document accompanying the USEPA's letter informing Illinois of their nonconurrence and has determined it is reasonable to presume the USEPA will come to the same conclusion regarding west Michigan's June 2020 demonstration.

In 2021, AQD staff and partner states have continued to evaluate the smoke conditions through a Lake Michigan Air Director's Consortium (LADCO) workgroup. The workgroup meets monthly throughout the ozone season and evaluates various tools to identify potential wildfire exceptional events for further investigation. There is no question the Great Lakes region, including Michigan, had smoke from various wildfires lingering in the atmosphere for a substantial period during midsummer. Most of the high ozone days this ozone season occurred in May and June. Initial evaluations of the May and June high ozone days do not point to smoke as being a large contributing factor to the elevated ambient concentrations. The workgroup, along with AQD staff, will continue to evaluate weather and smoke conditions from the summer months to determine if there are days in need of further investigation to determine possible regulatory significance in any of the nonattainment areas.

Considering the information above, submittal of the previously proposed exceptional event demonstrations would not advance Michigan's goal of regaining attainment for the west Michigan nonattainment areas. The AQD continues to devote our available resources to the ozone planning elements that are likely to have material effects on improving air quality and regaining attainment for both west and southeast Michigan. Therefore, at this time, the AQD has decided not to submit the proposed exceptional event demonstrations for consideration by the USEPA. If, upon further reviewing the 2021 wildfire conditions and/or the 2022 ambient ozone data, it is determined there is renewed regulatory significance to any portion of the previously proposed exceptional events demonstrations, the AQD will consider revising the demonstrations and making a submittal to the USEPA.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Shanley". The signature is fluid and cursive, with a large initial "T" and "S".

Air Quality Evaluation Section Manager
Air Quality Division
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