



MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

Air Quality Division

Sulfur Dioxide One-Hour National Ambient Air Quality Standard Nonattainment State Implementation Plan for Wayne County (partial)

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TABLE of CONTENTS

I. EXECUTIVE SUMMARY 1

II. BACKGROUND 1

 1. 2010 1-hour SO₂ NAAQS 1

 2. Previous SO₂ SIP Submittal and FIP 2

III. PLAN ELEMENTS OVERVIEW 3

IV. THE SO₂ ATTAINMENT PLAN FOR WAYNE COUNTY 4

 1. Stationary Emission Sources Contributing to SO₂ Nonattainment 4

 2. Control Strategy 4

 3. Attainment Demonstration 5

 4. Enforceable Requirements 5

 5. Reasonably Available Control Technology and Measures (RACT and RACM) 7

 6. Reasonable Further Progress 8

 7. Base and Attainment Year Emission Inventories 8

 8. Contingency Measure 8

 9. New Source Review Program 9

 10. Conformity 9

V. PUBLIC PARTICIPATION 10

VI. CONCLUSION 10

APPENDIX A: EPA Federal Implementation Plan

APPENDIX B: EPA Federal Implementation Plan Technical Support Document

APPENDIX C: EPA Partial Approval / Partial Disapproval of the Detroit Sulfur Dioxide₂ Nonattainment Area Plan

APPENDIX D: Control Plan; Revised U.S. Steel and DIG Permits

APPENDIX E: Public Comments Received and AQD Responses

I. EXECUTIVE SUMMARY

This State Implementation Plan (SIP) presents Michigan's plan to demonstrate attainment of the 2010 1-hour Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) for the Wayne County nonattainment area. The provisions of this SIP mirror those found in the United States Environmental Protection Agency (EPA) Federal Implementation Plan (FIP) and accompanying Technical Support Document (TSD), which can be found in Appendices A and B of this document, respectively. This plan describes a control strategy that reduces and limits SO₂ emitted by the owner or operator of U.S. Steel facilities, the primary facility still contributing to SO₂ nonattainment in this area.

U.S. Steel is a steelmaking facility in the SO₂ nonattainment area. SO₂ emission sources include boilerhouses, blast furnaces, and flares on Zug Island, and reheat furnaces and boilers at nearby portions of the facility. The SIP requires a revised air permit be submitted by the owner or operator of U.S. Steel facilities to the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Air Quality Division (AQD), that sets SO₂ emission limits on these emission sources. Further, the permit includes a requirement for installation of a new stack on Boilerhouse 2. The FIP requires a permit request be submitted to the AQD by the owner or operator of U.S. Steel facilities within 3 months of a final FIP, and the new stack must be completed and operating within 2 years. A second revised air permit, for Dearborn Industrial Generation (DIG), is also part of the FIP and this SIP.

There are several other large sources of SO₂ in the area. SO₂ emissions from these sources will continue to be regulated under existing permit requirements, which will be incorporated into the SIP. The sources are EES Coke, Cleveland-Cliffs Steel Corporation, and Carmeuse Lime. DTE Energy's (DTE) River Rouge and Trenton Channel power plants were historically included as large sources of SO₂ in the area. However, they were permanently shut down in 2021 and 2022, respectively. The DTE Trenton Channel limit is approved into the SIP and is relied upon for this attainment plan.

AERMOD modeling of these SO₂ sources by the EPA shows that the provisions contained in the FIP and to be incorporated in the revised permit for the owner or operator of U.S. Steel facilities will provide for modeled attainment of the 2010 SO₂ NAAQS in the Wayne County SO₂ nonattainment area. The originally violating AQD SO₂ air monitor in the area has shown attainment of the NAAQS since 2014. Therefore, this AQD SIP shows attainment for the SO₂ nonattainment area in a portion of Wayne County by adopting the provisions of the FIP.

The AQD is requesting approval of this SIP revision conditional upon the submittal of a permit by the owner or operator of U.S. Steel facilities and a DIG permit revision that mirror the requirements set forth in the FIP and will be equally stringent to the FIP. The AQD commits to submit these permits to the EPA for incorporation into the SIP within one year of a conditional approval.

II. BACKGROUND

1. 2010 1-hour SO₂ NAAQS

In 2010 the EPA lowered the primary SO₂ NAAQS, setting a 1-hour standard of 75 parts per billion (ppb), which is attained when the 3-year average of the 99th percentile of 1-hour daily

maximum concentrations does not exceed 75 ppb. The standard replaced the two primary standards initially promulgated in 1971 and was retained in a subsequent review of the standard in 1996. These previous SO₂ NAAQS were a 24-hour standard of 140 ppb and an annual standard of 30 ppb. The EPA revoked both standards as part of the 2010 revision, finding the new 1-hour standard is more protective of human health.

In October 2013 (78 FR 47191) the EPA designated a portion of Wayne County as nonattainment under the 2010 SO₂ NAAQS. The nonattainment designation was based on ambient air quality data collected at an AQD monitoring site (Southwest Detroit monitor, AQS site ID 26-163-0015) from 2009 through 2011. The design value for this 3-year period was 90 ppb. Figure 1 depicts the boundaries of the nonattainment area, which is a portion of Wayne County.

Figure 1. Wayne County 2010 SO₂ NAAQS Nonattainment Area.



2. Previous SO₂ SIP Submittal and FIP

With the designation of the portion of Wayne County as nonattainment for SO₂, the AQD undertook the task of developing a SIP to show how the area would return to attainment of the NAAQS. Such a demonstration required both monitored attainment of the NAAQS and modeled attainment using the AERMOD dispersion model. As explained above, the violating air monitor began attaining the NAAQS in 2014, so the remaining requirement was to show what SO₂ reductions would be needed to model attainment, using allowable SO₂ emissions from the large SO₂ sources in the area.

After several years of evaluations, modeling, and negotiations with the affected sources, the AQD produced a demonstration that showed, via modeling, attainment of the NAAQS. The SIP was submitted to the EPA in May 2016, followed up by a revision in June 2016 (the addition of a final rule containing emission limits for the U.S. Steel facility). U.S. Steel subsequently sued the Michigan Department of Environmental Quality (predecessor to EGLE) over the new rule, followed by months of mediated negotiations between EGLE and the company. Ultimately no resolution was reached, and the judge ruled against EGLE by voiding the rule with the U.S. Steel

limits. Because of this, the SIP could no longer show, via modeling, that attainment would be reached by implementation of the other SIP controls, which resulted in the EPA disapproving, in part, the SIP submission.

The federal Clean Air Act (CAA) requires the EPA to develop a FIP when a state SIP submission is disapproved, and the EPA began development of a FIP for the Wayne County SO₂ nonattainment area in 2018. The FIP includes an attainment demonstration and other elements required under the CAA. In addition to an attainment demonstration, the FIP addresses the requirement for meeting reasonable further progress (RFP) toward attainment of the NAAQS, reasonably available control measures and reasonably available control technology (RACT/RACM), enforceable emission limitations and control measures to provide for NAAQS attainment, and contingency measures.

The FIP action supplements a prior EPA action, which found Michigan had satisfied emission inventory and nonattainment new source review (NSR) requirements for this area but had not met requirements for the elements addressed in the FIP. The EPA has determined the FIP provides for attainment of the 2010 primary SO₂ NAAQS in the Detroit SO₂ nonattainment area and meets the other applicable requirements under the CAA.

In addition to pursuing the FIP, the EPA issued a partial approval/partial disapproval of the original AQD SIP effective on April 19, 2021. The partial approval/partial disapproval is included in Appendix C of this document. The partial approval by the EPA approved two permits as SIP strengthening; Carmeuse Lime's Permit to Install 193-14A and DTE Trenton Channel's Permit to Install 125-11C. The EPA also approved the 2012 baseline inventory as meeting the requirements of CAA Section 172(c)(3) and (4) for the Detroit SO₂ NAA and affirmed the NSR requirements for the area have been met because Michigan has a fully approved nonattainment NSR Program.

The AQD is pursuing a revision to the original 2016 SO₂ SIP submittal with this document and is requesting approval of this SIP revision conditioned upon the submittal of a permit by the owner or operator of U.S. Steel facilities and DIG permit revision that mirror the requirements set forth in the FIP and will be equally stringent to the FIP. The AQD commits to submit these permits to the EPA for incorporation into the SIP within one year of a conditional approval.

III. PLAN ELEMENTS OVERVIEW

The State of Michigan is required to develop a plan showing that the 2010 SO₂ NAAQS will be attained on the same schedule as the EPA FIP for the Wayne County nonattainment area. The EPA identifies a number of elements that must be addressed by a plan in its "*Guidance for 1-Hour SO₂ Nonattainment Submissions*," issued April 23, 2014. These elements and where they are addressed in this plan are listed in Table 1.

Table 1. SO₂ Attainment Plan Elements

Plan Element	Section
Identification of stationary emission sources contributing to SO ₂ nonattainment	IV.1
Identification of the control strategy	IV.2
Demonstration of attainment	IV.3
Implementation of enforceable requirements	IV.4
Satisfaction of reasonably available control technology and measures (RACT and RACM)	IV.5
Fulfillment of reasonable further progress (RFP)	IV.6
Base year and attainment year projected emissions inventories	IV.7
Commitment of contingency measures in the event the identified control strategy does not result in attainment	IV.8
Demonstration of an NSR program meeting Clean Air Act requirements	IV.9
Demonstration of meeting Clean Air Act conformity requirements	IV.10

IV. The SO₂ Attainment Plan for Wayne County

The attainment plan in this Michigan SIP aligns with the EPA SO₂ FIP for the Wayne County nonattainment area. Therefore, the following sections contain relevant information by referring to, and including excerpts from, the FIP and TSD. The FIP and TSD are located in Appendices A and B of this document, respectively.

1. Stationary Emission Sources Contributing to SO₂ Nonattainment

The EPA included all point sources over 100 tons per year of SO₂ within 50 kilometers of Detroit in its modeling analysis. These sources included U.S. Steel (Ecorse and Zug Island), EES Coke, DTE Trenton Channel, Carmeuse Lime, DTE Monroe, Cleveland-Cliffs Steel Corporation, DIG, and Marathon Refinery. DTE River Rouge was not included in the modeling analysis as all units with SO₂ emissions have been permanently and enforceably shut down. The EPA believes the area of analysis adequately represents the area where maximum concentrations of SO₂ are expected and adequately includes the sources which might contribute to those concentrations. No other sources within 50 kilometers were determined by the EPA to have the potential to cause significant concentration gradient impacts within the area of analysis.

2. Control Strategy

Michigan's control strategy for demonstrating attainment of the 2010 SO₂ NAAQS is to implement the provisions found in the FIP, including a revised permit for the owner or operator of U.S. Steel facilities. The revised permit will require new emission limits on U.S. Steel operations, a new stack on Boilerhouse 2 on Zug Island, and existing permitted emission rates for the other sources of SO₂ identified and modeled in the FIP. It should be noted the SIP and FIP will include a revision to the DIG permit, adding an emission limit resulting from terminology differences between AQD rules and EPA requirements.

3. Attainment Demonstration

To support the FIP for bringing the Detroit area into attainment of the 2010 SO₂ NAAQS, the EPA conducted a modeling demonstration of the Detroit area that contains an assessment of the air quality impacts that would be allowable under enforceable emission limits from the following explicitly modeled sources: U.S. Steel (Ecorse and Zug Island), EES Coke, DTE Trenton Channel, Carmeuse Lime, DTE Monroe, Cleveland-Cliffs Steel Corporation (formerly AK or Severstal Steel), DIG, and Marathon Refinery.

The analysis was conducted in accordance with the EPA's modeling requirements to support attainment demonstrations, which are specified by regulation in Appendix W of 40 CFR Part 51 (Guideline on Air Quality Models), as referenced by 40 CFR 51.112. The FIP TSD describes the model and modeling parameters used in the analysis, as well as the EPA's modeling results and conclusions, and is in Appendix B of this SIP document.

4. Enforceable Requirements

For purposes of attaining the 2010 SO₂ NAAQS, emission requirements for the owner or operator of U.S. Steel facilities that are equally stringent to the requirements set forth in the FIP will be made permanent and enforceable under a permit that the AQD commits to submit for incorporation into the SIP within one year of a conditional approval of this SIP. These emission limits and control requirements are specified in the FIP and include a new stack on Boilerhouse 2 commencing operation not later than two years after the effective date of the FIP, which is November 14, 2024.

The AQD commits to submitting a revised DIG Permit to Install that contains limits that mirror the limits set forth in the FIP for incorporation into the SIP within one year of a conditional approval. The DIG permit is being revised because the EPA changed the limits. Specifically, in addition to an existing daily average limit of 420 lbs./hr. for DIG Boilers 1, 2, and 3 (combined), the EPA is setting an additional daily average limit of 840 lbs./hr. for DIG Boilers 1, 2, and 3, and Flares 1 and 2 (combined). Both limits will apply at all times. This additional limit is not reflective of any new control strategies; rather it ensures maximum operating conditions are protective of the NAAQS. This permit revision is one of the conditions for conditional approval.

Emission requirements for the other two SO₂ emission facilities in the area, EES Coke and Cleveland-Cliffs, are enforceable through Title V Renewable Operating Permits 1996000132 and 199700004, respectively. The AQD is requesting the permits for EES Coke, and Cleveland-Cliffs Steel Corporation be incorporated into the SIP.

The requirements in Table 2 below for the Hot Strip Mill Slab Reheat Furnaces 1-5, No. 2 Baghouse, Main Plant Boiler No. 8, and Main Plant Boiler No. 9 apply to the owner and operator of the U.S. Steel Ecorse facility, and the requirements in this section for Boilerhouse 1, Boilerhouse 2, A1 Blast Furnace, B2 Blast Furnace, D4 Blast Furnace, A/B Blast Furnace Flares, and D Furnace Flare apply to the owner and operator of the U.S. Steel Zug Island facility.

Tables 2 and 3 contain the various SO₂ emission limits the facilities addressed above are subject to and include status of the limits relative to the Michigan SIP.

Table 2. U.S. Steel Units Emission Limits and Related information*

Unit	SO ₂ Emission Limit (lbs./hr.)	Permit	SIP Status
Boilerhouse 1 (all stacks combined)	55.00	The permit application to be submitted to the AQD	The permit to be included in this SIP
Hot Strip Mill – Slab Reheat Furnace 1	0.31	“	“
Hot Strip Mill – Slab Reheat Furnace 2	0.31	“	“
Hot Strip Mill – Slab Reheat Furnace 3	0.31	“	“
Hot Strip Mill – Slab Reheat Furnace 4	0.31	“	“
Hot Strip Mill – Slab Reheat Furnace 5	0.31	“	“
No. 2 Baghouse	3.30	“	“
Main Plant Boiler No. 8	0.07	“	“
Main Plant Boiler No. 9	0.07	“	“
A1 Blast Furnace	0.00	“	“
B2 Blast Furnace	40.18	“	“
D4 Blast Furnace	40.18	“	“
A/B Blast Furnace Flares	60.19	“	“
D Furnace Flare	60.19	“	“

*This table does not include proposed limits for Boilerhouse 2, which are described below.

Boilerhouse 2 Provisions

Beginning two years after the effective date of the FIP, no owner or operator shall emit SO₂ from Boilerhouse 2 in excess of 750.00 lbs./hr. unless Boilerhouse 1, A1 Blast Furnace, B2 Blast Furnace, D4 Blast Furnace, A/B Blast Furnace Flares, or D Furnace Flare is operating, in which case it shall emit less than 81.00 lbs./hr.

The owner or operator shall construct a stack for Boilerhouse 2. The stack emission point must be at least 170 feet above ground level. The owner or operator shall submit a construction permit application for the stack to the State of Michigan within 90 days of the effective date of the FIP, which is February 14, 2023. Where any compliance obligation under this section requires any other state or local permits or approvals, the owner or operator shall submit timely and complete applications and take all other actions necessary to obtain all such permits or approvals. Beginning two years after the effective date of the FIP, which is November 14, 2024, no owner or operator shall emit SO₂ from Boilerhouse 2, except from the stack emission point at least 170 feet above ground level.

Table 3. Facility/Unit Emission Limits and Related Information

Facility & Units	SO ₂ Emission Limit (lb./hr.)	Permit	SIP Status
DIG		To be submitted to the AQD	
Boilers 1, 2, 3 combined	420**		Upon issuance, permit to be a revision to the SIP
Boilers 1, 2, 3 and flares 1 and 2 combined	840**		Upon issuance, permit to be a revision to the SIP
DTE Trenton Channel	5907*	125-11c	Approved, 3/21
Carmeuse Lime	470	193-14a	Approved, 3/21
DTE River Rouge	Shut down	MI-ROP-B2810-2012c, modified on 08-18-21	Not applicable
EES Coke		51-08C	In FIP regulatory text
Combustion Stack	544, based on 3 hr. block average		
Cleveland-Cliffs Steel		MI-ROP-A8640-2016a	In FIP regulatory text
Furnace B Stove Stack	38.75**		
Furnace C Stove Stack	193.6**		
Furnace B Baghouse Stack	71.9**		
Furnace C Baghouse Stack	179.65**		
Furnace B Baghouse and Stove Stack (combined)	77.8**		
Furnace C Baghouse and Stove Stack (combined)	271.4**		

*30-day average, as provided for in the EPA's April 2014 Guidance and addressed in Section V, Long Term Averaging, and Section VI.D.2, Longer-Term Average Limits, of the June 1, 2022, FIP *Federal Register* notice.

** Daily average, as provided for in the EPA's April 2014 Guidance and addressed in Section V, Long Term Averaging, and Section VI.D.2, Longer-Term Average Limits, of the June 1, 2022, FIP *Federal Register* notice.

5. Reasonably Available Control Technology and Measures (RACT and RACM)

As indicated in the EPA's SO₂ guidance, the control strategy should include all RACT and RACM that can be implemented as expeditiously as practical. This implementation is to occur no later than five years after designation.

The EPA has determined both RACT and RACM for SO₂ are the levels of emission reduction necessary to demonstrate attainment with the 2010 SO₂ NAAQS. Since the emission requirements implemented for the owner or operator of U.S. Steel facilities, along with the other

three facilities, are being implemented under the FIP to demonstrate attainment, and the AQD commits to submitting permits that will be equally stringent to the FIP for approval into the SIP, these same emission requirements (emission levels) fulfill RACT and RACM for the Wayne County SO₂ nonattainment area.

EGL has determined the appropriate compliance schedule satisfying an expeditious compliance date for RACM are compliance dates that are incorporated in the EPA's FIP. This schedule is necessary because the control strategy relies on adding a new stack on U.S. Steel Boilerhouse 2, and this project is required to be completed within two years of the FIP approval.

6. Reasonable Further Progress

This SIP for the 2010 SO₂ NAAQS must fulfill requirements for RFP. The SIP guidance defines RFP as the amount of incremental emission reductions required during interim years to ensure attainment is reached by the attainment date.

In this case, SO₂ emitted by U.S. Steel facilities, will be controlled to meet emission limits and stack requirements, and existing emission limits on the other large SO₂ sources in the FIP will be maintained so attainment is reached. Since there are no interim steps for controlling emissions from this source, attainment will be reached and all requirements for RFP are fulfilled.

7. Base and Attainment Year Emission Inventories

The EPA addresses the base year inventory and the attainment year inventory in the FIP very briefly by pointing to the inventories in their action of partially approving and partially disapproving the original AQD SO₂ SIP (Appendix C). Their approval of the 2012 base year inventory by that action is appropriate for the FIP base year inventory, the FIP states. Further, the attainment year inventory is contained in the FIP as well and is represented by the allowable and maximum uncontrolled SO₂ emissions that are modeled to show attainment.

For purposes of this SIP, the base year inventory of 2012 is appropriate, and the attainment year inventory is represented by the allowables table in the Enforceable Requirements section of this SIP.

8. Contingency Measure

The EPA's SO₂ implementation guidance states SO₂ attainment is source specific. As such, the EPA indicates requirements placed on the culpable facilities and sources provide a high degree of certainty attainment will be achieved. If this is not the case and attainment is not measured, then re-evaluating facility emission requirements is a valid contingency measure. The guidance reads:

Since SO₂ control measures are by definition based on what is directly and quantifiably necessary to attain the SO₂ NAAQS, it would be unlikely for an area to implement the necessary emission controls, yet fail to attain the NAAQS. Therefore, for SO₂ programs, EPA has explained that "contingency measures" can mean that the air agency has a comprehensive program to identify sources of violations of the SO₂ NAAQS and to undertake an "aggressive" follow-up for compliance and enforcement, including expedited procedures for establishing enforcement consent

agreements pending the adoption of the revised SIP. ¹⁷ The EPA believes that this approach continues to be a valid approach for the implementation of contingency measures to address the 2010 SO₂ NAAQS.

As stated in the EPA guidance above, “contingency measures” for SO₂ attainment plans can mean the air agency has a comprehensive program to identify sources of violations of the SO₂ NAAQS and to undertake an “aggressive” follow-up for compliance and enforcement. This is the approach taken by the AQD to address contingency measures in this SIP. Michigan has adequate enforcement authority to enter and inspect sources based on Section 5526 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 324.5526. This is further shown by the EPA’s approval of the Michigan Title V program. All of the sources in the SIP strategy are major sources and in the Title V program, Michigan has an EPA-acceptable Title V compliance monitoring program, including periodic inspections, review of company monitoring records, reporting, and issuance of violation notices for all violations identified from inspections or data. Michigan responds promptly to citizen complaints. Michigan reports all high priority violations to the EPA and puts all inspection reports and violation notices on our website. Michigan pursues enforcement actions on all EPA-defined high-priority violations, addressing the EPA’s Timely and Appropriate Enforcement Policy. Therefore, this meets the requirements of CAA Section 172(c)(9).

In the event SO₂ attainment is not measured in the Wayne County nonattainment area, Michigan commits to re-evaluate stationary source SO₂ emission limit requirements.

9. New Source Review Program

An approvable SO₂ plan requires a demonstration that Michigan has an NSR program in place for permitting new sources in nonattainment areas as required by the CAA under Sections 172(c)(5) and 173. The CAA mandates the NSR program regulates permitting for the construction of new or modification of existing major stationary sources and requires lowest achievable emission rates. In addition, the permitted source must provide offsets for the remaining balance of emissions beyond the lowest achievable emission rates level of control.

The EPA affirmed in its March 19, 2021, action, their partial approval/partial disapproval of Michigan’s 2016 SO₂ SIP for the Wayne County nonattainment area, that AQD had previously met NSR requirements. The EPA references the *Federal Register* at 78 FR 76064 (December 16, 2013) where the NSR approval occurs. Therefore, another review of the NSR requirements was not included in the FIP nor in this SIP.

10. Conformity

The EPA Guidance asserts the State must “...show that its SIP provisions are consistent with Section 176(c)(4) conformity requirements.” Section 176(c) of the CAA requires states to establish criteria and procedures to ensure federally supported or funded activities, including highway projects, must conform to the air quality planning goals in the applicable SIPs. The two types of conformity requirements and Michigan’s demonstration of compliance with them are listed below.

1. *Transportation Conformity Requirements and Motor Vehicle Emission Budgets*

Transportation conformity under Section 176(c) is the requirement to determine conformity. Michigan's transportation conformity SIP was approved by the EPA on December 18, 1996 (61 FR 66609) and was updated on April 10, 2017 (82 FR 17134). In addition, EGLE has a Memorandum of Agreement (MOA) among the Michigan Department of Transportation, the EPA, and the various state and local agencies involved in the transportation process. The 2016 MOA Regarding Determination of Conformity of Transportation Plans, Programs, and Projects to State Implementation Plans was signed on December 13, 2016, by the EPA and is available on the AQD Webpage at https://www.michigan.gov/documents/egle/egle-aqd-sdu-transportation_conformity_moa_671525_7.pdf.

For purposes of the Wayne County SO₂ nonattainment area, conformity is not applicable. In its SO₂ nonattainment area SIP guidance, the EPA states, due to the relatively small and decreasing amounts of sulfur in gasoline and on-road diesel fuel, the EPA's transportation conformity rules only apply to SO₂ nonattainment areas in two cases: (1) if the Regional Administrator or the director of a state air agency has found that transportation-related emissions of SO₂ as a precursor are a significant contributor to a PM_{2.5} nonattainment problem, or (2) if the SIP has established an approved or adequate budget for such emissions as part of the RFP, attainment or maintenance strategy (40 CFR 93.102(b)(1), (2)(v)). Conformity does not apply to this area because mobile sources are not considered a significant emitter of SO₂; therefore, they do not need to be further addressed in this SIP.

2. *General Conformity Requirements*

General conformity under Section 176(c) also requires conformity for all other non-transportation, federally supported or funded projects. Michigan's general conformity SIP was approved by the EPA on December 18, 1996 (61 FR 66607).

V. PUBLIC PARTICIPATION

In accordance with Section 110(a)(2) of the CAA, the AQD is required to hold take public comment prior to the adoption of this plan and subsequent submittal to the EPA. The AQD met this requirement by holding a 30-day public comment period on the draft SO₂ SIP beginning on October 17, 2022, and concluding on November 15, 2022. A public hearing was available on an as-requested basis, but none was requested.

Two parties provided public comment, U.S. Steel and EES Coke. The comments and AQD's responses are contained in Appendix E of this document.

VI. CONCLUSION

The SIP will meet Michigan's CAA obligation after submittal of the U.S. Steel and DIG permits, which Michigan commits to submit within a year of a conditional approval. The plan is consistent with the EPA SO₂ FIP for the nonattainment area and fully demonstrates attainment of the 2010 SO₂ NAAQS through EPA air dispersion modeling of an effective control strategy, in accordance with the requirements of Section 172(c) and consistent with the EPA FIP.

Appendix A
EPA Federal Implementation Plan

The final FIP is available at this link <https://www.govinfo.gov/content/pkg/FR-2022-10-12/pdf/2022-21662.pdf>.

Appendix B
EPA Federal Implementation Plan Technical Support Document

<https://www.regulations.gov/document/EPA-R05-OAR-2021-0536-0002>

Appendix C
EPA Partial Approval/Partial Disapproval of the Detroit Sulfur Dioxide
Nonattainment Area Plan

<https://www.regulations.gov/document/EPA-R05-OAR-2016-0321-0037>

Appendix D Control Plan; Revised U.S. Steel and DIG Permits

The SIP revision addressing the SO₂ nonattainment area in a portion of Wayne County will include specific controls that will facilitate demonstrating attainment. The controls are to be incorporated in revised AQD air permits for the owners or operators of U.S. Steel facilities and DIG. As described in the EPA FIP for this area, the U.S. Steel permit must be submitted to EGLE within 3 months of finalizing the FIP, which is February 14, 2023. The new stack on Boilerhouse 2 must be completed within 2 years of FIP finalization, which is November 14, 2024. Revisions of the DIG permit must be completed to align with the FIP. Upon EGLE approval of the two permits, they will be included in this Appendix to the SIP. The AQD is requesting Conditional Approval of this SIP and commits to completing these 2 permits within 1 year of a Conditional Approval. Other controls have already been adopted in the nonattainment area as described in the EPA Partial Approval/Partial Disapproval action for the SO₂ nonattainment area, located in Appendix C of this document.

Appendix E
Public Comments Received and AQD Responses

U.S. Steel comments

Comment: EGLE specifically references “U. S. Steel” as the party responsible for submitting permit applications, specifically for Boilerhouse 2. This is not consistent with EPA’s final FIP. The FIP states that the *owner or operator* must submit permit applications to EGLE.

Response: The suggested revisions have been made in the SIP document.

Comment: The SIP also incorrectly identifies U. S. Steel as the “primary facility still contributing to SO₂ nonattainment in this area” which is inaccurate under the current and other future operating scenarios with many emission units idled.

Response: Language in the SIP has been revised to address this comment.

Comment: In Section IV, Table 2. “U. S. Steel Units Emission Limits and Related Information*”, U. S. Steel requests changing the language from “The permit is to be submitted to the AQD” to “The permit *application* is to be submitted to the AQD.”

Response: The suggested change has been made in the SIP document.

Comment: Section IV #4 of the SIP, “Boilerhouse 2 Provisions,” outlines two different operating scenarios and associated emission limits for Boilerhouse 2 that are inaccurate and do not align with the EPA’s FIP.

Response: The SIP document has been updated to align with the FIP operating scenarios and associated emission limits.

EES Coke comments

Comment: The emission units listed in this comment should be included as operating in the scenario when Boilerhouse 2 has an emission limit of 750.00 lbs./hr. The inclusion of these units in this operating scenario is supported by the final SO₂ FIP published by the EPA.

Response: The AQD has updated the SIP document to address this comment, consistent with the final FIP.

Comment: In Appendix D, EGLE is requesting approval with a commitment to issue revised permits for U.S. Steel and DIG within 1 year of Conditional Approval. Regarding the Permit to Install (PTI) for the installation of the Boilerhouse 2 stack, to meet the 2-year timeline from the final EPA FIP the PTI needs to be issued by April 2023. This will allow the necessary time to fabricate and install the stack upon PTI approval. In lieu of the PTI being issued by April 2023, a construction waiver issued by April 2023 will suffice to meet the 2-year timeline.

Response: The AQD is aware of the timing issues described by the commenter and is making every effort to complete the permit to install process in a timely manner.