



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

June 29, 2023

VIA ELECTRONIC SUBMISSION

John Mooney, Director, Air and Radiation Division
United States Environmental Protection Agency Region 5
77 West Jackson Boulevard, AR-18J
Chicago, Illinois 60604-3507

Dear John Mooney:

By way of this letter, the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Air Quality Division (AQD) is submitting the attached report entitled, "Sulfur Dioxide Emissions from Large Sources in Michigan," as required by the Data Requirements Rule.

The report addresses three electric-generating facilities, a paper manufacturer, and a cement manufacturer that used actual sulfur dioxide (SO₂) emissions in modeling to show attainment of the 1-hour SO₂ National Ambient Air Quality Standard. The report compares 2022 SO₂ emissions and several previous years of annual SO₂ emissions from the five facilities with those emissions used in the attainment modeling.

The public comment period on the report began on May 22, 2023, and ended on June 20, 2023. One comment was received supporting the findings of the report.

If you have any questions regarding this submittal, please contact Robert Irvine, SIP Development Unit, AQD, at 517-648-7367; IrvineR@Michigan.gov; EGLE, P.O. Box 30260, Lansing, Michigan 48909-7760; or you may contact me.

Sincerely,

Annette Switzer, Director
Air Quality Division
517-284-6773

Enclosure

cc: Sarah Arra, United States Environmental Protection Agency, Region 5
Tom Shanley, EGLE
Robert Irvine, EGLE
Alec Kownacki, EGLE

Sulfur Dioxide Emissions from Large Sources in Michigan

Air Quality Division | June 2023

The Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Air Quality Division submits this report pursuant to the United States Environmental Protection Agency's (USEPA) Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS). Specifically, Title 40 of the Code of Federal Regulation, Part 51.1205(b) states, "For any area where modeling of actual SO₂ emissions serve[s] as the basis for designating such area as attainment for the 2010 SO₂ NAAQS, the air agency shall submit an annual report to the EPA Regional Administrator by July 1 of each year ... that is available for public inspection, that documents the annual SO₂ emissions of each applicable source in each such area and provides an assessment of the cause of any emissions increase from the previous year."

The applicable sources in Michigan are three power plants, a cement manufacturing plant, and a paper manufacturing plant. Specifically, the sources are the Consumers Energy J.H. Campbell power plant in West Olive, the Consumers Energy Dan E. Karn power plant in Essexville, the Lansing Board of Water & Light Erickson power plant in Lansing, the Lafarge Cement plant in Alpena, and the Escanaba Paper Mill in Escanaba. The Lansing Board of Water & Light Eckert power plant has been dropped from the table because it has been shut down for the last two years, and its boilers are permanently and physically disabled and no longer included in the Renewable Operating Permit.

Annual SO₂ emissions for the five emission sources are derived from each company's annual reporting to EGLE via the Michigan Air Emissions Reporting System (MAERS) forms. The emissions for year 2022 are compared to the 2012-2014 emissions to determine if there were increases. All five sources continue to emit well below the 2012-2014 emission levels.

Based on the analysis of 2022 emissions compared to modeled emissions, it is reasonable to conclude that no additional modeling is necessary. The existing modeling that was approved by the USEPA in its attainment/unclassifiable determination for the affected counties, using 2012-2014 emissions data, can still be relied upon to demonstrate that the NAAQS continues to be met in these areas.

Background

On June 2, 2010, the USEPA revised the primary NAAQS for SO₂ to 75 parts per billion on a 1-hour average. The federal Clean Air Act requires states to recommend to the USEPA appropriate designations of areas in the state relative to the new NAAQS. This

can be determined with ambient air monitoring or with modeling when monitoring is not available. The USEPA makes the final designation determination.

Designations for the new 1-hour SO₂ standard were performed in three rounds. Round 1 covered areas which, based on ambient air quality monitoring data for the years 2009-2011, showed violations of the 1-hour SO₂ standard. That standard was not being met at the EGLE monitoring station located at Southwestern High School in Detroit.

Consequently, in July 2013, the USEPA formally designated a portion of southern Wayne County as “nonattainment” of the SO₂ standard. This formal designation required EGLE to develop a State Implementation Plan (SIP) for bringing the area into compliance with the NAAQS for SO₂. On May 31, 2016, EGLE submitted its SO₂ SIP strategy for southern Wayne County to the USEPA for final approval. Effective April 19, 2021, the USEPA partially approved and partially disapproved the SIP submittal. To address the portion that was disapproved the USEPA finalized a Federal Implementation Plan for the nonattainment area on October 12, 2022.

Round 2 covered stationary sources that either emitted more than 16,000 tons of SO₂ in 2012 or emitted more than 2,600 tons of SO₂ with a 2012 emission rate of at least 0.45 pounds of SO₂ per million BTU. Sources announced, as of March 2, 2015, future retirements were not covered. The USEPA identified eight coal-fired power plants in Michigan that met this criterion. The affected companies provided dispersion modeling for these facilities using either actual SO₂ emissions or allowable emissions, at their discretion. Modeling showed that only one area, a portion of St. Clair County, was not attaining the NAAQS. On July 1, 2016, the USEPA designated the counties of Bay, Eaton, Ingham, Marquette, Monroe, and Ottawa as attainment/unclassifiable and a portion of St. Clair County as nonattainment. SO₂ emissions from two coal-fired power plants in St. Clair County; DTE Belle River and DTE St. Clair; when modeled, showed SO₂ levels that exceed the 1-hour standard. EGLE submitted a Clean Data Determination in 2020 to the USEPA based on SO₂ monitoring near the two power plants which showed the area to be attaining the NAAQS. The USEPA approved the Clean Data Determination in a *Federal Register* notice dated December 7, 2021.

Round 3 affects two stationary sources subject to the USEPA Data Requirements Rule. Under this rule, designations are required for areas having sources that emit more than 2,000 tons per year of SO₂ that were not addressed in previous rounds. The two sources conducted dispersion modeling using actual emissions which showed impacts meeting the NAAQS for SO₂. EGLE submitted its attainment designation recommendations for the two sources to the USEPA in January 2017 and the USEPA designated the two areas attainment/unclassifiable on April 9, 2018. With the designation comes the requirement that EGLE include the two sources in the SO₂ emissions report due each July.

Data Requirements Rule – Ongoing Data Requirements

The dispersion modeling for Rounds 2 and 3 could be performed using actual emissions or allowable emissions at the company’s discretion. The Data Requirements Rule requires that when actual emissions are used for modeling and the USEPA designates an area as attainment of the NAAQS, states must submit to the USEPA an annual SO₂ emissions report by July 1 of each year showing the latest annual emissions from each modeled facility. If emissions have increased from the levels modeled, the state must explain the reason for the increase to the USEPA. The USEPA may determine that modeling needs to be redone using the higher emissions to ensure the SO₂ impacts are not causing the area to go into nonattainment.

Annual SO₂ Emissions

A listing of annual SO₂ emissions for the three affected power plants, for the cement plant, and paper mill reside in the EGLE MAERS database. Emissions for 2012-2014 as well as the last several years from the power plants, and the paper and cement plants, are listed in the following table.

The USEPA’s attainment/unclassifiable designations of the counties in which these plants are located are based on dispersion modeling using the SO₂ emissions for the years 2012-2014. The purpose of this annual report is to show updated emissions for 2022 and compare them to the 2012-2014 emissions. If the more recent emissions are less than the modeled emissions, a conclusion can reasonably be made that modeling with the more recent emissions data will not show increased SO₂ impacts in the attainment/unclassifiable areas.

Table 1: Annual Tons of SO₂ Emissions

Power Plant	Annual Tons of SO ₂ Emissions					
	2012	2013	2014	2020	2021	2022
CE J.H. Campbell	21501	23627	25760	3956	6369	5520
CE DE Karn	6853	8561	6353	602	1077	992
BWL Erickson	2685	3903	3626	1704	2486	2755
Other Sources						
Lafarge Cement	7820	10087	2503	1680	1994	2286
Escanaba Paper	1210	1950	2068	660	609	590

Analysis

For the 2022 analysis year, the power plant SO₂ emissions continue to be well below those used in the modeling (2012-2014), as reflected in the table above. The table also shows the same to be true for the paper and cement plants. EGLE therefore concludes that new modeling is not required for the plants subject to Rounds 2 and 3 because the affected areas are reasonably expected to continue to show attainment of the SO₂ NAAQS.

Public Comment

EGLE held a 30-day public comment period on the draft report from May 22 to June 20. Only one comment was received, supporting the contents of the report. The report will be submitted to the USEPA and requested to be added to the Michigan SO₂ SIP.

Prepared by: Alec Kownacki
Air Quality Evaluation Section
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
June 22, 2023

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