

DRAFT

Second 10-Year Maintenance Plan for the Belding Lead Area



Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909-7760

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[PUBLIC NOTICE/COMMENT PERIOD DRAFT]

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Introduction

On May 31, 2017, the United States Environmental Protection Agency (USEPA) promulgated a direct final rule¹ (effective July 31, 2017) approving Michigan's request to revise the designation of the Belding nonattainment area in Ionia County to attainment of the 2008 National Ambient Air Quality Standards (NAAQS) for lead (Pb). Michigan's redesignation request also included the first 10-year maintenance plan for Belding. The redesignation became effective on July 31, 2017, via the direct final rule.

Under Section 175A(b) of the federal Clean Air Act (CAA), "8 years after redesignation of any area as attainment area under 107(d), the State shall submit to the Administrator an additional revision of the applicable State implementation plan for maintaining the national primary ambient air quality standard for 10 years," (42 U.S.C. § 7505a). This is called the second 10-year maintenance plan. This submittal addresses the required second 10-year maintenance plan elements for the Belding Pb Maintenance Area (MA).

The elements of a maintenance plan include: (1) maintenance of the standard for 10 years, and (2) contingency measures that will be enacted without major state or federal action if the standard is violated. This submittal is organized into the following sections (in this order): an air quality evaluation, an emissions trends analysis and estimation of future projections, a maintenance demonstration, a monitoring network evaluation, a verification of continued attainment, and an updated contingency plan.

This demonstration of maintenance shows that emissions of Pb from stationary point sources located within the Belding MA are expected to remain negligible throughout the remainder of the first 10-year maintenance period and throughout the second period, starting in July 2027 and ending in 2037, since there is no longer an operating facility generating Pb emissions within the boundaries of the MA.

Background

At the beginning of the first maintenance period (July 2017), Mueller Brass Company (MBC) operated only two of its remaining emission units: a brass melting furnace – which was controlled by the east baghouse – and a copper upcast machine that was installed in 2016 in accordance with the applicable exemptions of Rule 290. According to an on-site inspection report from June 19, 2017², the facility had already dismantled

¹ <https://www.federalregister.gov/documents/2017/05/31/2017-10928/air-plan-approval-michigan-redesignation-of-the-belding-area-in-onia-county-to-attainment-of-the>

² https://www.egle.state.mi.us/aps/downloads/SRN/B1650/B1650_SAR_20170619.pdf

the east chip dryer, removed the No. 9 brass furnace line, and shut down the west chip dryer (except for a short run in August 2016) since the previous on-site inspection.

According to a compliance report that was compiled following an on-site inspection on April 19, 2019³, the facility notified EGLE that they experienced a fire in the east baghouse on March 16, 2019. Following the fire, casting restarted on March 22, 2019, after the east chamber of the baghouse was re-bagged. The facility also restarted the west chip dryer on March 28, 2019, while the wet chip melter at the affiliated Port Huron facility was down. The dryer subsequently shutdown on April 7, 2019, and was not restarted following this occurrence.

During a follow-up inspection on April 26, 2019, according to a violation notice issued on June 5, 2019, “EGLE staff observed operation of the No. 7 furnace while the west chamber of the east baghouse was inoperable. It was determined that the No. 7 furnace was operated with only one of the two chambers of the east baghouse operation[al] from March 22, 2019, until May 1, 2019, following a fire on March 16, 2019, that rendered the west chamber of the east baghouse inoperable.” On July 19, 2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) requested that MBC submit stipulated fines in accordance with the provisions of Paragraph 13 of Consent Order No. 9-2011⁴ by August 19, 2019.

On November 15, 2023, MBC submitted to EGLE a letter requesting to void Permit-to-Install (PTI) No. 16-11 (Attachment A). In the letter, the responsible official indicated that the majority of site operations were idled in November 2019. It was also noted that the facility did not operate equipment in 2023, and that the site had been completely cleared of its operating equipment and all previously permitted emission units (chip dryers and melt furnaces), which were removed prior to November 1, 2023.

MBC is currently utilizing the facility located at 302 Ashfield Street to manufacture brass forgings and machining of various brass components such as PEX fittings. The process involves receiving brass rod feedstock from Mueller Industries’ brass facility located in Port Huron, Michigan. Once received, the brass rod is processed through a forging press or computer numerical control type equipment directly to produce fittings which will be used in the plumbing tube market. The fittings are then shipped out to various markets. The fitting sizes will range from ¼” – 1” and include tees, elbows, adapters, and couplings. MBC has indicated to EGLE that this process does not produce any Pb

³ [blob:https://mienviro.michigan.gov/47f27755-d149-4fc4-a71e-2837cc3a6ddf](https://mienviro.michigan.gov/47f27755-d149-4fc4-a71e-2837cc3a6ddf)

⁴ https://www.egle.state.mi.us/aps/downloads/SRN/B1650/B1650_STIP_20190719.pdf

emissions and will not contribute to exceedances of the 2008 Pb NAAQS during the second 10-year maintenance period.

Clean Air Act Section 175A Requirements and Demonstrations

1.0 Air Quality Evaluation

Since 2011, EGLE has operated site-specific, high volume total suspended particulate (TSP) samplers in the city of Belding near MBC at two locations: monitor 260670002 was sited at Reed Street and monitor 260670003 is sited at Merrick Street (see Figure 1). Placement of these monitors was guided by dispersion modeling to indicate the location of maximum expected concentration of Pb concentrations in the previously designated nonattainment area – which was determined to be within the immediate vicinity of the Muller Brass Company facility. Through *Michigan's 2019 Ambient Annual Air Monitoring Network Review Plan*, EGLE proposed to shut down the Reed Street monitor (260670002) at the end of 2018 due to “continued values below the standard.” EGLE determined that continuing to operate the Merrick Street monitor (260670003) was necessary for detecting fugitive Pb emissions from the facility. In *Michigan's 2020 Ambient Annual Air Monitoring Network Review Plan*, EGLE noted that the Reed Street monitor had been shut down in January 2019.

As depicted in Table 1 and Chart 1, the design values (maximum rolling 3-month average over a 3-year period) at the Merrick Street monitor have not exceeded the 2008 Pb NAAQS of 0.15 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) from 2012 through 2025. Chart 1 displays the Pb monitoring design values in the Belding MA over the 13-year time period (2012-2025) and projects the 3-year design values into the future until 2037 – which is the end year of the second 10-year maintenance period. EGLE anticipates, however, that the future 3-year design values recorded by the Merrick Street monitor through July 2027 will likely be lower than 0.05 $\mu\text{g}/\text{m}^3$, although this was determined to be the projected value for all future design value years.

Chart 2 displays the individual 24-hour Pb values that were sampled from the Merrick Street monitor every six days between 2010 and December 2025. During the first maintenance period, the monitor has recorded seven (7) 24-hour samples that have exceeded the 2008 Pb NAAQS threshold – although the standard itself was never violated. These 24-hour exceedances occurred on March 9, 2018 (0.2133 $\mu\text{g}/\text{m}^3$), October 29, 2018 (0.1716), March 16, 2019 (0.7527), April 3, 2019 (0.1945), October 24, 2019 (0.1521), February 10, 2022 (.5576), and April 30, 2024 (.2113). Many of these 24-hour exceedances can be attributed to demolition and equipment removal

activities that took place at the MBC facility; for example, the south chip dryer was removed from the site on February 10, 2022, and the press and billet furnaces were removed on April 30, 2024. Additionally, the 24-hour exceedance that occurred on March 16, 2019, was directly linked to the on-site fire which impacted the operability of the East Baghouse.

It should also be noted that sampled data was not collected at the Merrick Street monitor (260670002) on November 7, 13, 19, and 25 of 2022, (see Table 2) due to improper air flow through the instrument, which was corrected and rectified in December 2022. In order to show that the missing monitoring data at this location for the month of November in 2022 would not have produced an exceedance of the 2008 Pb NAAQS, EGLE relied upon the USEPA's monitoring data substitution policy to put together a 'Data Substitution Analysis' report that accounts for the missing monitoring data from November 2022 (see Attachment B). According to the results of the report, "the analysis shows that the Belding-Merrick Street monitor would not have violated the standard during November 2022 when data was incomplete" (see pg. 5 of Attachment B).

Figure 1: Location of Reed Street Monitor (260670002), Merrick Street Monitor (260670003), and the Location of Mueller Brass Company



Table 1: Pb Design Values at the Merrick Street Monitor in Belding, Michigan

3-Year Design Values (DVs, in $\mu\text{g}/\text{m}^3$)													
Designated Area	AQS Site ID	2012-2014	2013-2015	2014-2016	2015-2017	2016-2018	2017-2019	2018-2020	2019-2021	2020-2022	2021-2023	2022-2024	2023-2025
Belding, Michigan	260670003	0.06	0.05	0.05	0.04	0.05	0.09	0.09	0.09	0.06	0.06	0.06	0.02

Chart 1: Actual and Projected Pb Design Values for Years 2012 to 2037 - Merrick Street Monitor

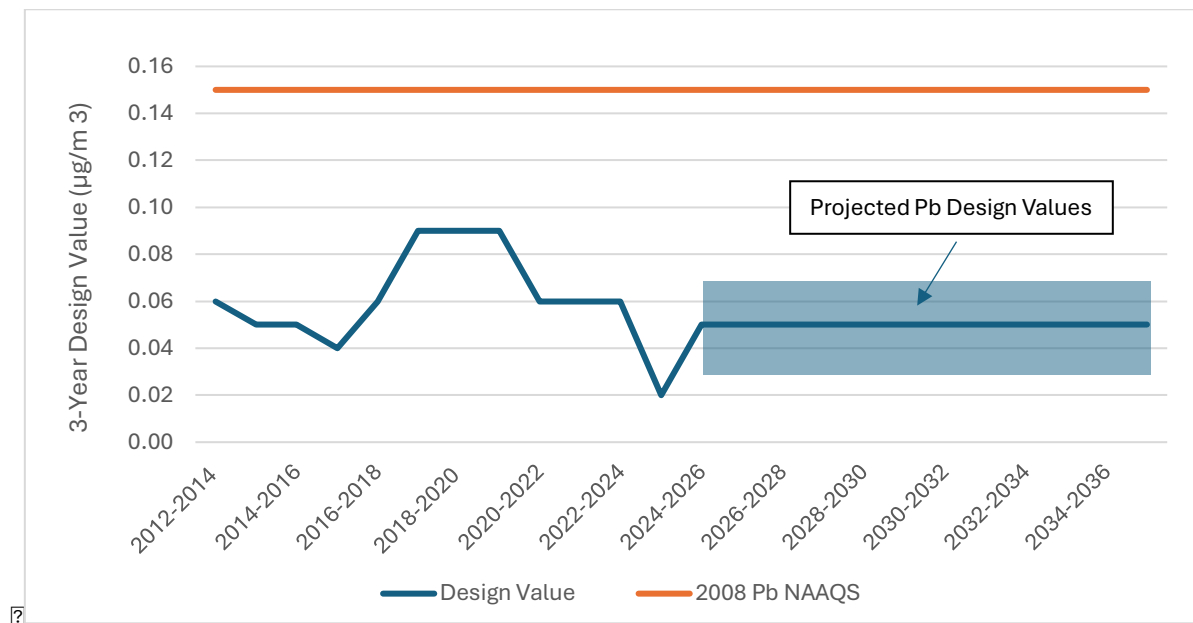


Chart 2: 24-hour Pb Values from the Merrick Street Monitor for January 2010 through December 2025

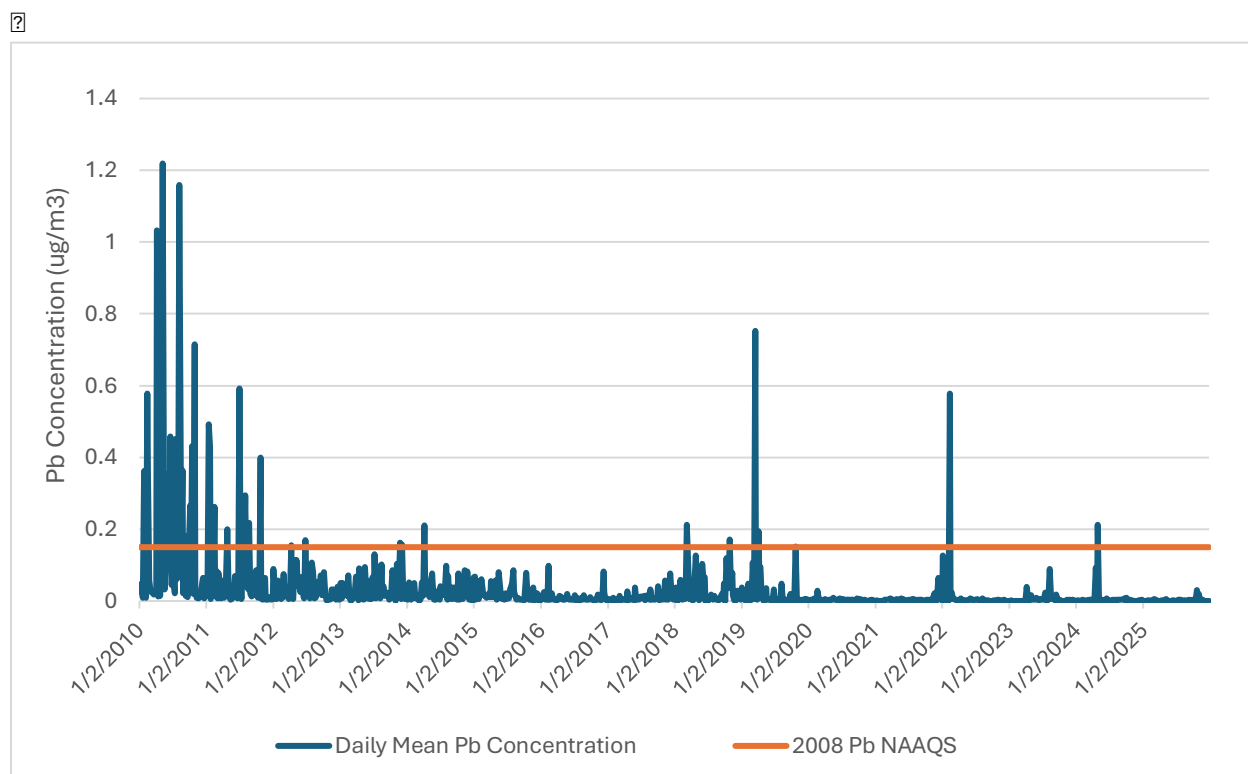


Table 2: 24-hour Pb Values from Merrick Street Monitor for October through December 2022

Date	Source	Site ID	Daily Mean Pb Concentration	Units
10/2/2022	AQS	260670003	0.001	ug/m3 LC
10/8/2022	AQS	260670003	0.002	ug/m3 LC
10/14/2022	AQS	260670003	0.001	ug/m3 LC
10/20/2022	AQS	260670003	0.002	ug/m3 LC
10/26/2022	AQS	260670003	0.001	ug/m3 LC
11/1/2022	AQS	260670003	0.003	ug/m3 LC
12/4/2022	AQS	260670003	0.001	ug/m3 LC
12/7/2022	AQS	260670003	0.003	ug/m3 LC
12/13/2022	AQS	260670003	0.001	ug/m3 LC
12/19/2022	AQS	260670003	0	ug/m3 LC
12/25/2022	AQS	260670003	0.001	ug/m3 LC
12/31/2022	AQS	260670003	0.001	ug/m3 LC

2.0 Emissions Inventory and Future-Year Projections

Page 8 of a memorandum issued by the USEPA on September 4, 1992⁵, titled *Procedures for Processing Requests to Redesignate Areas to Attainment* (USEPA 1992 Guidance), Subsection A (Attainment Inventory) under Section 5 (Maintenance Plans) specifies that;

“(Each) state should develop an attainment emissions inventory to identify the level of emissions in the area which is sufficient to attain the NAAQS.”

and...

“Where (a) state has made an adequate demonstration that air quality has improved as a result of the State Implementation Plan (SIP), the attainment inventory will generally be the actual inventory at the time the area attained the standard.”

On page 6 of Michigan’s 2016 submittal to the USEPA, titled “Request for Redesignation to Attainment for the 2008 Pb NAAQS and Pb Maintenance Plan for

⁵ https://www.epa.gov/sites/default/files/2016-03/documents/calagni_memo_-_procedures_for_processing_requests_to_redesignate_areas_to_attainment_090492.pdf

Ionia County (Partial), City of Belding” (2016 Maintenance Plan)⁶, EGLE set the attainment year for the Belding MA as 2013, since the 2012-2014 period of certified air quality data produced the 3-year design value that was below the 2008 Pb NAAQS threshold of 0.15 µg/m³.

In this section, EGLE is providing stationary point source Pb emissions data from the USEPA’s *Emissions Inventory System (EIS) Gateway*⁷ for years 2013 and 2017-2023, as well as nonpoint source Pb emissions data from the USEPA’s 2020 National Emissions Inventory (2020 NEI) for the base year – which was selected in consultation with the USEPA – and projected the emissions data to 2027 (beginning year of the second maintenance period) and 2037 (end year of the second maintenance period). These inventories were used to evaluate continued compliance with the NAAQS over the second 10-year maintenance period.

2.1 First Maintenance Period (2017-2023) Stationary Point Source Emissions Trends and Attainment Year (2013) Comparison

Emissions data from the USEPA’s *EIS Gateway* demonstrates that there are currently no facilities or permitted stationary point sources that produce Pb emissions located in the Belding MA. The MBC facility located within the Belding MA ceased all operations that produced emissions of Pb in 2019 and its PTI was voided on November 15, 2023.

Pb emissions for the 2013 attainment year and first seven years (2017-2023) of the first maintenance period for this facility are shown in Table 3. Over the course of the first seven years of the first 10-year maintenance period, the Pb emissions from stationary point sources never exceeded the inventoried point source Pb emissions for the 2013 attainment year and have instead been reduced by 100% between 2013 and 2025.

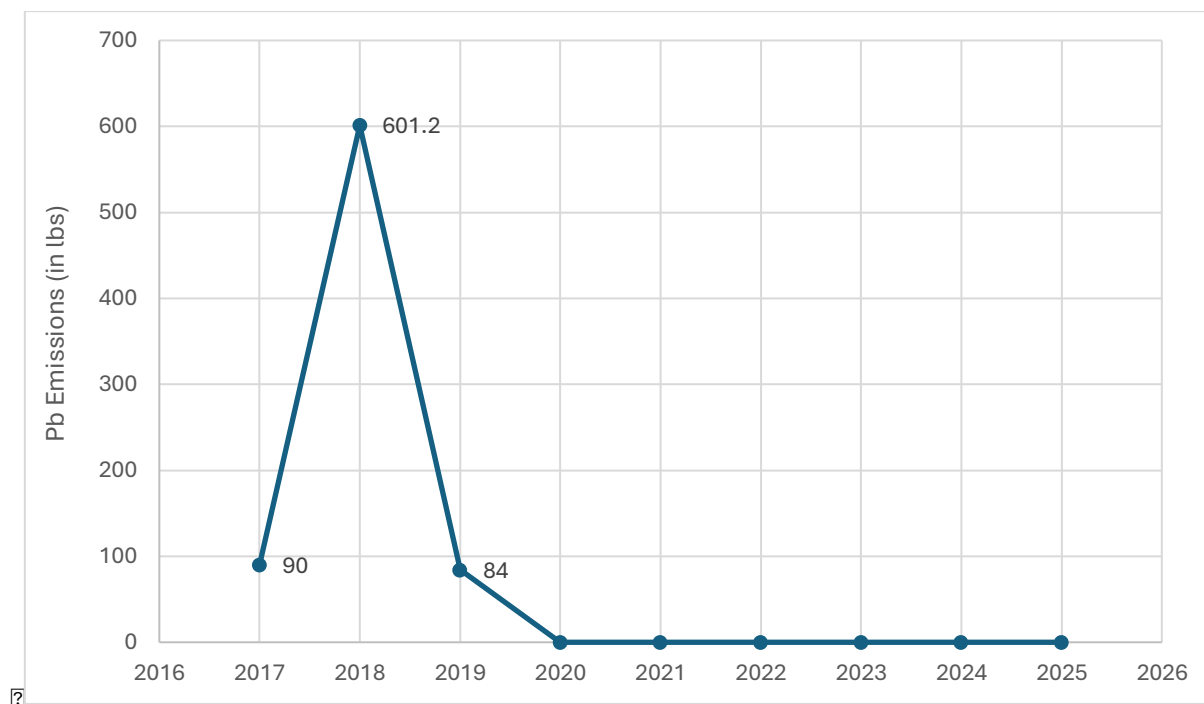
The graph in Chart 3 depicts the annual emissions trends from the one stationary point source (MBC) of Pb emissions within the Belding MA that operated between 2017 and 2025. As shown, annual Pb emissions for MBC have been reduced to zero since 2020 and have remained at zero due to the shutdown of all equipment and processes at the MBC facility that once produced Pb emissions.

⁶ <https://www.regulations.gov/document/EPA-R05-OAR-2016-0044-0003>

⁷ <https://www.epa.gov/air-emissions-inventories/emissions-inventory-system-eis-gateway>

Table 3: Historical Annual Pb Emissions (in lbs/year) for Stationary Point Sources in the Belding Maintenance Area

	2013	2017	2018	2019	2020	2021	2022	2023	2024	2025
Mueller Brass Company, Inc. (B1650)	1,153	90	601.2	84	0	0	0	0	0	0
2013 = attainment year 2017 = beginning of first 10-year maintenance period										
Source: https://www.epa.gov/air-emissions-inventories/emissions-inventory-system-eis-gateway										

Chart 3: Pb Emissions from Stationary Point Sources in the Belding Maintenance Area (2017-2025)

2.2 Stationary Point Source Pb Emissions Projections for the Belding Maintenance Area through the Second 10-year Period

As of August 2026, there are no permitted Pb sources within the Belding MA. Furthermore, with no indications of potential future sources of Pb will seek permits to install in the Belding MA, EGLE projects that Pb emissions from stationary point sources will remain negligible through future year 2037 (see Table 4).

Table 4: Stationary Point Source Pb Emissions History and Projected Annual Inventories for the Belding MA

	Year	Emissions (lbs/year)
Nonattainment Years	2009	2,277.7
	2011	1,402.9
Attainment Year	2013	1,153.2
Baseline Emission Year	2020	0
Most Recent Data Certified Emission Year	2023	0
Projected Future Year*	2027	0
Projected Future Year**	2037	0
*beginning of second 10-year maintenance period		
**end of second 10-year maintenance period		

2.3 First Maintenance Period Nonpoint Source Pb Emissions Trends and Attainment Year Comparison for Ionia County

EGLE gathered and compared Pb emissions data for all area (nonpoint) source categories applicable to Ionia County from the USEPA's 2014 National Emissions Inventory (2014v2 NEI) Database⁸ and the 2020 NEI⁹. The year 2014 was selected as the attainment year for this nonpoint source emissions evaluation as it represents the NEI year that is closest to the attainment year (2013) for the Belding MA, while 2020 was selected as the comparative year due to it being the most recent NEI inventory year that collected Pb emissions data. The 2020 NEI also serves as the base year for emissions projections into the second maintenance period (see section 2.4).

As demonstrated in Table 5 and Table 6, Pb emissions from nonpoint sources across Ionia County increased by approximately 0.461 lbs between 2014 and 2020. Although nonpoint source Pb emissions did experience a slight increase between 2014 and 2020 for Ionia County, this increase did not contribute to an exceedance of the 2008 Pb NAAQS at the Merrick Street monitor (260670003) in Belding.

Pb emissions were not derived for the on-road or nonroad sectors in the 2020 NEI for Ionia County.

Table 5: 2014v2 NEI Nonpoint Source Pb Emissions by Sector for Ionia County

County	Nonpoint Source Sector	Emissions (lbs/year)
Ionia	Fuel Comb - Comm/Institutional - Coal	0.005
	Fuel Comb - Comm/Institutional - Natural Gas	0.220
	Fuel Comb - Comm/Institutional - Oil	0.058

⁸ <https://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-data>

⁹ <https://www.epa.gov/air-emissions-inventories/2020-national-emissions-inventory-nei-data>

County	Nonpoint Source Sector	Emissions (lbs/year)
	Fuel Comb - Comm/Institutional - Other	0.004
	Fuel Comb - Industrial Boilers, ICEs - Coal	0.612
	Fuel Comb - Industrial Boilers, ICEs - Natural Gas	0.180
	Fuel Comb - Industrial Boilers, ICEs - Oil	0.448
	Fuel Comb - Industrial Boilers, ICEs - Other	0.992
	Fuel Comb - Residential - Oil	0.803
	Gas Stations	0.005
	Miscellaneous Non-Industrial NEC	0.226
Total Emissions (Ionia County)		3.553

Table 6: 2020 NEI Nonpoint Source Pb Emissions by Sector for Ionia County

County	Nonpoint Source Sector	Emissions (lbs/year)
Ionia	Fuel Comb - Comm/Institutional - Natural Gas	0.140
	Fuel Comb - Comm/Institutional - Oil	0.026
	Fuel Comb - Comm/Institutional - Other	0.007
	Fuel Comb - Industrial Boilers, ICEs - Natural Gas	0.020
	Fuel Comb - Industrial Boilers, ICEs - Oil	2.714
	Fuel Comb - Residential - Oil	0.685
	Gas Stations	0.109
	Miscellaneous Non-Industrial NEC	0.313
Total Emissions (Ionia County)		4.014

2.4 Nonpoint Source Pb Emission Projections for the Belding Maintenance Area through the Second 10-year Period

According to the USEPA 1992 Guidance, second maintenance plans require a projection of the emissions inventory to at least ten (10) years from the base year inventory to ensure continued compliance with the 2008 Pb NAAQS.

For the purpose of projecting Pb emissions from nonpoint sources in the Belding MA to 2027 (beginning year of the second maintenance period) and 2037 (end year of the second maintenance period), the 2020 NEI was used to represent the base year emissions data. It should be noted that this base year was selected in consultation with the USEPA.

The Belding MA represents less than one (1) percent of the total land area of Ionia County. To account for this, EGLE apportioned the historical and projected nonpoint source Pb emissions for Ionia County based on the approximate size of the Belding MA (see Table 7). For the Belding MA, there is no difference in Pb emissions from nonpoint sources between the base year and projected future years, largely because growth in

nonpoint source Pb emissions is expected to be negligible due to stagnant population, housing, and employment growth rates for the City of Belding, Michigan.

This further supports EGLE’s expectation that Pb emissions across all source categories (stationary point, nonpoint, etc.) applicable to the Belding MA will not surpass the attainment year point source emissions inventory of 1,153.15 lbs per year.

Table 7: Nonpoint Source Pb Emissions History and Projections for Ionia County and the Belding Maintenance Area

Area	Attainment Year Emissions (2014v2 NEI) (lbs/year)	Base Year Emissions (2020 NEI) (lbs/year)	2027 Projected Emissions (lbs/year)	2037 Projected Emissions(lbs/year)
Ionia	3.55	4.01	N/A	N/A
Belding MA	<.035	<.04	<.04	<.04

3.0 Maintenance Demonstration

Through the memorandum issued by the USEPA on September 4, 1992¹⁰, – which includes guidance that applies to both first and second 10-year maintenance plans submitted by states – the USEPA explains that “a state may generally demonstrate maintenance of the NAAQS by either showing that future emissions of a pollutant or its precursors will not exceed the level of the attainment inventory or by modeling to show that the future mix of sources and emission rates will not cause a violation of the NAAQS.”

Michigan’s second maintenance plan submission demonstrates that the area will continue to maintain the 2008 Pb NAAQS through 2037, at a minimum. This is because Pb emissions from stationary point sources in the Belding MA for projected year 2037 should remain well below the level that was inventoried for the 2013 attainment year: 1,153.15 lbs. The enforceable limits under PTI No. 16-11 are no longer applicable as MBC submitted a request to void the permit to EGLE on November 15, 2023, and the permit was subsequently voided. Provided that no other source of air pollution located in the Belding MA is permitted to emit Pb, EGLE anticipates that the stationary point source Pb emissions within the Belding MA will remain at negligible levels through 2037.

4.0 Monitoring Network

Beginning in 2011, EGLE has operated site-specific, high volume TSP samplers in the city of Belding near MBC at two locations: monitor 26067002 was sited at Reed Street

¹⁰ https://www.epa.gov/sites/default/files/2016-03/documents/calagni_memo_-_procedures_for_processing_requests_to_redesignate_areas_to_attainment_090492.pdf

and monitor 26067003 is sited at Merrick Street (see Figure 1). Placement of these monitors was guided by dispersion modeling to indicate the location of maximum expected concentration of Pb emissions in the previously designated nonattainment area.

In 2019, following approval by the USEPA, EGLE suspended sampling for Pb at the Reed Street location. As indicated in *Michigan's 2027 Ambient Air Monitoring Network Review*¹¹, which was finalized by EGLE on July 17, 2026, and subsequently submitted to the USEPA on July 20, 2026, EGLE is planning on monitoring for Pb at the source-oriented monitor at Merrick Street in Belding until August 1, 2027, which signifies the end of the first maintenance period for this area.

4.1 Plan for Pb Monitoring

With the complete shutdown of all operations that once produced Pb emissions at MBC in 2019, the Merrick Street site (260670003) will continue to monitor for Pb through July 2027 as per the maintenance plan requirement for the first maintenance period.

At the end of the first maintenance period, EGLE will discontinue monitoring and remove the monitor from the Merrick Street location in Belding, Michigan. EGLE will maintain its compliance with federal regulations and requirements set under Title 40 of the Code of Federal Regulations (CFR), Part 58, Appendix D, Section 4.5.

5.0 Contingency Plan

Section 175A(d)¹² of the CAA states that “each plan revision submitted... shall contain such contingency provisions as the Administrator deems necessary to assure that the State will promptly correct any violation of the standard which occurs after the redesignation of the area as an attainment area. Such provisions shall include a requirement that the State will implement all measures with respect to the control of the air pollutant concerned which were contained in the State implementation plan for the area before redesignation of the area as an attainment area.”

The USEPA 1992 Guidance further specifies that the “contingency plan is considered to be an enforceable part of the SIP and should ensure that the contingency measures are adopted as expediently once they are triggered,” (see pg. 12). It also describes that the

¹¹ <https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Programs/AQD/monitoring/network-reviews/2027-ambient-monitoring-network-review-plan.pdf?rev=6f3dcec6a049494a9f53410fc8aaff1d&hash=314AD5FD9A299CD7B3991EA298CC087C>

¹² <https://www.govinfo.gov/content/pkg/USCODE-2013-title42/html/USCODE-2013-title42-chap85-subchapl-partD-subpart1-sec7505a.htm>

state must identify the applicable trigger level or indicator that would induce the action level response outlined in the contingency plan. Additionally, the guidance articulates that “the plan should clearly identify the measures to be adopted, a schedule and procedure for adoption and implementation, and a specific time limit for action by the State.”

5.1 Contingency Measures in the First 10-Year Maintenance Plan

On page 7 of Michigan’s *Revision to Michigan’s State Implementation Plan: Lead Maintenance Plan for Ionia County (Partial), City of Belding*¹³, EGLE outlined contingency measures in the unlikely event that the 2008 Pb NAAQS was violated during the first maintenance period.

These contingency measures are specified below:

- i. Increase inspection frequency of MBC to twice per year, beginning three months after a quality-assured violation of the NAAQS level at the Belding air monitoring site. The increased inspection frequency will remain in place until the quality-assured Pb ambient air monitored levels show NAAQS compliance on a 3-year rolling average.
- ii. Require MBC to submit an enhanced preventative maintenance/malfunction abatement plan within six months after a quality assured violation of the NAAQS level at a Belding air monitoring site.
- iii. Require MBC to reassess control strategies that further limit Pb emissions within one year of quality-assured violation of the NAAQS level at a Belding air monitoring site.

5.2 Contingency Measures in the Second 10-Year Maintenance Plan

In preparation of the second 10-year maintenance period, EGLE has made the determination that the contingency measures incorporated into the first 10-year maintenance plan are no longer applicable because MBC has ceased all operations that once produced Pb emissions and its PTI has been voided.

Given that the only source of Pb in the Belding MA is no longer permitted to generate Pb emissions, EGLE has deemed it reasonable to rescind its previously approved contingency plan for the Belding MA and replace it with an updated set of contingency measures and control requirements that have been made enforceable through a Final Order with MBC (see Attachment C). This Order was made available to the public for a 30-day notice and comment period, which began on October 5, 2026, and ended on

¹³ <https://www.regulations.gov/document/EPA-R05-OAR-2016-0044-0003>

November 5, 2026, at 11:59 p.m., prior to the Order being formally entered and made effective on (insert date).

6.0 Verification of Continued Attainment

CAA §110(a)(2)(E)¹⁴ requires that “each State provide necessary assurances that the State... will have adequate personnel, funding, and authority under State law to carry out such implementation plan requirements.”

EGLE has both the legal authority and funding necessary to implement strategies for the purpose of maintaining and verifying continued attainment with the 2008 Pb NAAQS under Michigan Public Act 451 of 1994¹⁵ and the following Michigan Air Pollution Control Rules¹⁶:

Annual Reporting

Part 1. General Provisions

Part 2. Air Use Approval

Part 9. Emission Limitation and Prohibitions — Miscellaneous

Part 18. Prevention of Significant Deterioration of Air Quality

The maintenance demonstration for the second 10-year period is based on a demonstration that projected future emission inventories will not exceed the attainment emissions inventory. EGLE will submit periodic emission inventories to the USEPA as stipulated by the federal Air Emissions Reporting Requirements to verify continued attainment (80 Federal Register 8796). Both actions will help to verify continued attainment in accordance with 40 CFR, Part 58.

Michigan commits to maintain the 2008 Pb NAAQS for the area and will require control measures for future sources coming to the area unless the state demonstrates through modeling that the standard can be maintained without one or more control measures.

Michigan, through EGLE’s enforcement program and the Department of Attorney General, has the legal authority and necessary resources to actively enforce any violations of its rules or permit provisions. EGLE will continue to enforce all rules that relate to emissions of Pb in the MA.

¹⁴ <https://www.govinfo.gov/content/pkg/USCODE-2013-title42/html/USCODE-2013-title42-chap85-subchapl-partA-sec7410.htm>

¹⁵ [MCL - Act 451 of 1994 - Michigan Legislature](#)

¹⁶ [ARS Public - MI Admin Code for Environment, Great Lakes and Energy - Air Quality Division](#)

Currently, there are no stationary point sources of Pb emissions located in the Belding MA since the MBC facility shut down all operations that once generated emissions of Pb and voided its PTI.

Title 40, Code of Federal Regulations (CFR), 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. A 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 included with this SIP submittal to the USEPA satisfies the formal request requirement.

2. Necessary Legal Authority

Appendix V requires states to submit evidence that 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 PA 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 EGLE, on behalf of the State of Michigan, 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.

The notice of this SIP revision and an opportunity for public comment and hearing is provided in Attachment D.

4. Valid Public Hearing

Appendix V requires EGLE, on behalf of 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.

As demonstrated in the public notice in Attachment D, EGLE provided an opportunity for a public hearing upon request. As stated in the public notice, requests for a public hearing needed to be submitted to EGLE by October 22, 2026.

5. Public Comments

Appendix V requires EGLE, on behalf of the state, to compile any public comments and the state's responses to them in the SIP submittal. These comments and responses can be found under Attachment E.

Conclusion

In May 2017, the USEPA approved Michigan's redesignation request and first 10-year maintenance plan for the Belding Pb MA. The required second 10-year maintenance plan for the Belding MA is included in this document.

Based on the evaluations and demonstrations documented in this submittal, EGLE finds that the Belding MA meets the requirements for maintenance plans under the CAA and the USEPA 1992 Guidance. Significant reductions in ambient air Pb concentrations have occurred since the beginning of the first 10-year maintenance period (2017), which are projected to remain relatively stable until the end of the second 10-year maintenance period (2037). Through the implementation of Michigan's annual emissions reporting and Prevention of Significant Deterioration and New Source Review permitting programs, EGLE is confident that future increases in Pb emissions from new or modified stationary point sources within the Belding MA will not produce violations of the 2008 Pb NAAQS.

In the event that EGLE is notified that demolition and/or construction-related activities will be undertaken at the facility and property currently owned by MBC during the second 10-year maintenance period, EGLE will commit to the implementation of the contingency plan outlined within this submittal and the accompanying order (see Attachment C).

The State of Michigan hereby requests that the second 10-year maintenance plan for the Belding MA be approved in accordance with the provisions specified under Section 175A of the CAA.

Attachment A

Mueller Brass Company Air Permit Cancellation Request



To Whom It May Concern:

I am the responsible official for the former Mueller Brass Co. (SRN: B1650) Facility, operating pursuant to PTI No. 16-11, located at 302 Ashfield Drive in Belding, Ionia County, Michigan. The majority of site operations were idled in November 2019. The facility did not operate equipment in 2023; the site has been cleared and no equipment is present, the permitted emission units (chip dryers and melt furnaces) were removed prior to **1 November 2023**

I request that EGLE void PTI No. 16-11 and remove this facility from Mi Enviro Portal. We appreciate your review of this request and confirmation that the permit is void.

If you have questions, please contact me or Mr. Eric Marko of NTH.

Thank you,

A handwritten signature in blue ink that reads 'Charles Blanton'.

Charles Blanton
Corporate Director – EHS&S
Mueller Industries, Inc.
150 Schilling Blvd
Collierville, TN 38107
901-753-3200

Attachment B

Data Substitution Analysis

DATA SUBSTITUTION ANALYSIS
2022 LEAD
BELDING-MERRICK (AQS SITE ID 260670003)

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION

November 6, 2025

Summary

In November 2022, the lead monitor at Belding-Merrick St. (260670003) had 1 of 5 samples collected giving it a 20% completeness for the month. Contractors running the site for the state of Michigan had some issues with the monitor and their contract was ending. The Air Quality Division (AQD) was not informed of this until December 4th, past the 7-day time of running qualifying make-up samples.

Section 4Cii(b) of Appendix R to Title 40 of the Code of Federal Regulations Part 50 requires a three-month rolling average with at least a 75% data capture. A “below NAAQS level” test may be used to substitute data in a case of less than 50% capture

“by substituting the highest reported daily value, month-specific, over the 3-year design value period in question, for all missing scheduled data in the deficient months (*i.e.*, bringing the data capture rate up to 100%).” The recalculated average must be below the National Ambient Air Quality Standard of 0.15ug/m³.

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) has analyzed the ambient monitoring data for 2022.

Table 1 – Dates Requested For Belding-Merrick St. Lead Monitor Data Substitution

Dates	Day Count
11/7/22-11/25/22	4 (1:6 day sampling)

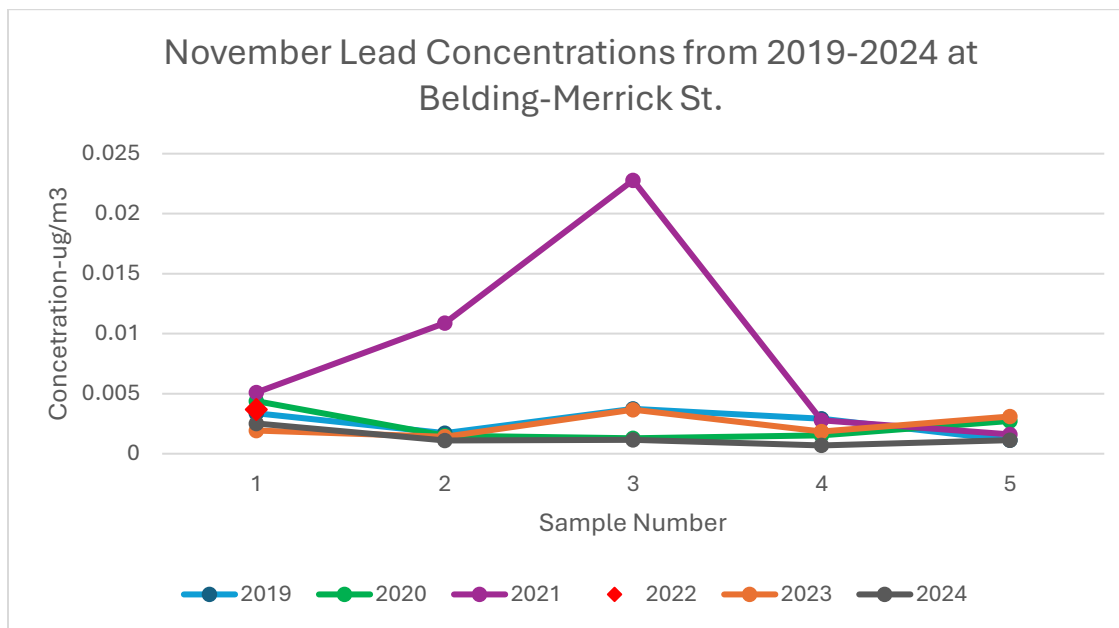
Methodology

Michigan EGLE used a conservative approach to determine what the missing values for November 2022 based on “below NAAQS level” test with less than 50% completeness. For this method, the highest reported daily value is substituted, “month-specific, over the 3-year design value period in question (2020-2022), for all missing scheduled data in the deficient months (*i.e.*, bringing the data capture rate up to 100%), the computation yields a recalculated 3-month parameter mean concentration equal or less than the level of the standard (0.15 µg/m³), then the 3-month mean is deemed to have passed the diagnostic test and the level of the standard is deemed not to have been exceeded in that 3-month period (for that parameter).” (40 CFR Part 50, App R Section 4Cii(b)).

Analysis

Historical Data: Lead data was collected for 2019-2022 for the month of November. The data is shown in Figure 1.

Figure 1. November daily lead concentrations for Belding-Merrick St. from 2019-2024.



The maximum value for each month in November from 2019-2024 is shown in Table 2 below. 2021 had the highest monthly value of 0.02279 ug/m3 as highlighted below.

Table 1. Maximum daily concentration of lead at Belding-Merrick St. for 2019-2024.

Year	Max Daily Value for November
2019	0.00374
2020	0.004381
2021	0.02279
2022	0.003681
2023	0.00367
2024	0.002521

The maximum value of 0.02279 ug/m3 was substituted for all four missing days in November 2022 and the monthly average was recalculated as seen in Table 2.

Table 2. Substituted daily concentrations for Belding-Merrick St. with recalculated monthly average.

Date	Daily Concentration	Source
11/1/22	0.003681	Actual value
11/7/22	0.02279	Substituted value
11/13/22	0.02279	Substituted value
11/19/22	0.02279	Substituted value
11/25/22	0.02279	Substituted value
Monthly Average	0.01896	Recalculated value

The recalculated monthly value of 0.01896 ug/m³ was used to determine the effected three-month rolling averages for 2022-2023 (Table 3). The highest 3 month rolling average was 0.01ug/m³, below the NAAQS standard of 0.15ug/m³.

Table 3. Recalculated three-month rolling value for Belding-Merrick

AIRS ID Site		260670003 Belding -Merrick St	
Year	Month	Mo Avg	3-Mo Avg
2022	9	0.00160	0.00
2022	10	0.00163	0.00
2022	11	0.01896	0.01
2022	12	0.00170	0.00
2023	1	0.00142	0.00

The maximum three-month value per year is shown in Table 4. The three-year design values for 2020-2022, 2021-2023, and 2022-2024 are 0.06ug/m³ (Table 5). The data substitution and highest recalculated three-month rolling average of 0.01ug/m³ did not change the design value for these 3-year periods.

Table 4. Three-month maximum rolling average per year for Belding-Merrick St. for 2020-2024.

Year	3-Month Max
2020	0.01
2021	0.01
2022	0.06
2023	0.02
2024	0.02

Table 5. Design values for 2020-2022, 2021-2023, and 2022-2024 for Belding-Merrick St.

3-Year Period	Design Value
2020-2022	0.06
2021-2023	0.06
2022-2024	0.06

Results: Analysis of the Belding-Merrick St. lead data using EPA’s “below NAAQS level” test with less than 50% completeness indicated that the substituted data for November did not change the three-year design values at this site. The substituted data resulted in a three-month rolling high value of 0.01 ug/m³. That value is lower than both the NAAQS and the design values for this site.

In conclusion, this analysis shows that the Belding-Merrick St. monitor would not have violated the standard during November 2022 when data was incomplete.

Attachment C

Draft SIP Order No. 2026-01
Mueller Brass Company

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
OFFICE OF THE DIRECTOR

In the matter of regulatory administrative
proceedings involving **Mueller Brass Company**,
a corporation organized under the laws of
the State of Michigan and doing business
at 302 Ashfield Street, in the City of Belding,
County of Ionia, State of Michigan

SIP Order: 2026-01

SRN: B1650

STIPULATION FOR ENTRY OF FINAL ORDER
By Consent

This proceeding results from provisions under Section 175A(d) of the federal Clean Air Act (CAA), Title 42 of the United States Code (U.S.C.), Section 7401 et seq., United States Environmental Protection Agency (USEPA), as amended, which requires states to include an approvable set of contingency provisions within their maintenance plans for the first and second 10-year periods following the redesignation of an area as an 'attainment area' for a National Ambient Air Quality Standard (NAAQS).

Extruded Metals, Inc. (Extruded) operated a brass rod manufacturing mill located at 302 Ashfield Street in Belding, Michigan (Plant) beginning in 1938. In 2007, Mueller Brass Company (Company) acquired Extruded, and the Plant continued to operate until 2019, producing rods for machining, thread rolling, and forging applications. On November 15, 2023, on behalf of the Plant, the Company submitted an air permit termination request letter to the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) to void Permit-to-Install No. 16-11. Prior to the cessation of operations at the Plant in 2019, the AQD identified the Plant as the sole contributor to nonattainment of the 2008 Lead NAAQS between 2008 and 2014 in Belding. Although the Plant is no longer permitted to operate in a manner that produces lead emissions and has not reported such emissions since 2019, there remains a potential risk of lead dust re-entrainment if the Company, or any future owner of the property, were to engage in demolition or construction-related activities. To mitigate such risk, additional protective measures, as outlined in the Compliance Program and Implementation Schedule of this Order, are being included within the Michigan State Implementation Plan for the second 10-year maintenance period (2027-2037) for the Belding area. The Company is the current owner of the property and all structures located at 302 Ashfield Street in Belding, Michigan.

The Company and EGLE stipulate as follows:

1. The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (NREPA), MCL 324.101 *et seq.*, is an act that controls pollution to protect the environment and natural resources in this State.
2. Article II, Part 55, Air Pollution Control, of the NREPA (Part 55), MCL 324.5501 *et seq.*, provides for air pollution control regulations in this State.
3. Executive Order 2019-06 renamed the Michigan Department of Environmental Quality to EGLE, and EGLE has all statutory authority, powers, duties, functions, and responsibilities to administer and enforce all provisions of Part 55.
4. The EGLE Director has delegated authority to the AQD Director to enter into this Order.
5. Part 55 of the NREPA, MCL 324.5503(f), provides EGLE, and therefore the AQD, with the authority to issue and enter into orders to control air pollution.
6. The resolution of this matter by this Order is proper and acceptable.
7. This Order becomes effective on the date of execution (Effective Date) by the AQD Director.

COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

8. The Company shall not conduct any demolition, deconstruction, or construction related activities or projects that have the potential to disturb the structural integrity of the former facility, or the paved roads or soils on the property grounds (collectively “construction activity”) unless the requirements of paragraphs 9 – 14 of this Order are satisfied.
9. The Company must submit the following to the AQD:
 - A. A notice of intent to pursue construction activity at least ninety (90) calendar days prior to the commencement of the construction activity.
 - B. A schedule that includes the proposed calendar dates on which the Company anticipates the construction activity will occur and the expected duration of all specified construction activity at least sixty (60) calendar days prior to the commencement of the construction activity.

C. A complete fugitive dust prevention plan addressing all on-site sources and pathways of potential lead re-entrainment for AQD approval, at least sixty (60) calendar days prior to commencement of the construction activity. The fugitive dust prevention plan shall follow the guidance established in EGLE's 2016 Managing Fugitive Dust Guide and the USEPA's 2022 Fugitive Dust Control Measures and Best Practices Document. Within thirty (30) calendar days of receiving the fugitive dust prevention plan from the Company, the AQD will in writing: (1) approve, in whole or in part, the submission; (2) approve, in whole or in part, the submission upon specified conditions; or (3) disapprove, in whole or in part, the submission, requiring the Company to correct the deficiencies. The Company shall, within thirty (30) calendar days or such longer time as specified by the AQD in such notice, address any requested changes or deficiencies and resubmit the plan for approval. Upon approval, the Plan shall be incorporated into and enforceable under this Order. Construction activity shall not commence unless an approved fugitive dust prevention plan is in place.

D. A fenceline air monitoring plan for the continuous measurement of particulate matter with a diameter of 10 microns and smaller (PM₁₀) for AQD approval. The plan shall include the instrumentation to be used, method detection limits, quality assurance protocols, and the data reporting and submittal format at least sixty (60) calendar days prior to the commencement of the construction activity. Within thirty (30) calendar days of receiving the fenceline air monitoring plan from the Company, the AQD will in writing: (1) approve, in whole or in part, the submission; (2) approve, in whole or in part, the submission upon specified conditions; or (3) disapprove, in whole or in part, the submission, requiring the Company to correct the deficiencies. The Company shall, within thirty (30) calendar days or such longer time as specified by the AQD in such notice, address any requested changes or deficiencies and resubmit the plan for approval. Upon approval, the Plan shall be incorporated into and enforceable under this Order. Construction activity shall not commence unless an approved fenceline air monitoring plan is in place.

10. Following written approval of the fenceline air monitoring plan from the AQD, the Company must operate a temporary fenceline PM₁₀ continuous monitor for at least 2 weeks before commencing any construction activity with the purpose of establishing a representative background concentration. All hourly PM₁₀ data collected by the fenceline monitoring must be sent to the AQD through the MiEnviro Portal at the end of each day during the designated 2-week period in a format that is acceptable to the AQD. Throughout the 2-week initial monitoring period, the Company will evaluate the background concentration data and will determine the thresholds which trigger specific actions that will

apply to the Company, or future owner of the property, throughout the duration of the activity in the following manner:

A. The Company will establish the baseline threshold for PM₁₀, at ten (10) percent above the highest hourly background ambient air concentration of PM₁₀ that was recorded during the 2-week period prior to the construction activity. The Company will notify the AQD in writing of the proposed baseline threshold. This baseline threshold will only apply following the Company's receipt of a written notice of approval from the AQD.

B. The Company will establish the elevated action threshold for PM₁₀, at twenty (20) percent above the highest hourly average ambient air concentration of PM₁₀ recorded during the 2-week period prior to the construction activity. The Company shall notify the AQD of the established elevated action threshold. This elevated action threshold will only apply following the Company's receipt of a written notice of approval from the AQD.

C. If the AQD determines the data collected during the 2-week period prior to the construction activity is not representative of normal background conditions, the AQD may require additional monitoring prior to the commencement of construction activity.

11. Upon commencing construction activity, the Company shall submit to the AQD a comprehensive daily report of the fence-line hourly PM₁₀ values in a format acceptable to the AQD. The report shall include written confirmation that neither the baseline nor the elevated action thresholds were exceeded during the 24-hour period.

12. Upon commencing construction activity, the Company shall notify the AQD within forty-eight (48) hours of the exceedance of either the baseline or elevated action thresholds established in paragraph 10 of this Order. This notification shall include:

A. All hourly monitoring values that indicate the action threshold for PM₁₀ was exceeded.

B. An explanation of all activities that were believed to have contributed to the exceedance.

C. All additional and achievable mitigative measures, not included in the fugitive dust prevention plan required in paragraph 9.C. of this Order, that the Company implemented to correct the exceedance as expeditiously as practicable, and will continue to implement throughout the duration of the activity.

Furthermore, the Company shall submit to the AQD on a daily basis all hourly monitoring values recorded following the exceedance until the data demonstrates that the hourly values have been consistently maintained below the baseline threshold for the entirety of a 48-hour time period.

13. The Company is required to update their fugitive dust abatement plan within two (2) calendar days of providing the AQD with the notification described in paragraph 12 of this Order. This updated plan shall detail the additional measures taken to address the exceedance and is subject to AQD approval. Within two (2) calendar days of receiving the updated fugitive dust abatement plan from the Company, the AQD will in writing: (1) approve, in whole or in part, the submission; (2) approve, in whole or in part, the submission upon specified conditions; or (3) disapprove, in whole or in part, the submission, requiring the Company to correct the deficiencies. The Company shall, within two (2) calendar days or such longer time as specified by the AQD in such notice, address any requested changes or deficiencies and resubmit the plan for approval. Upon approval, the updated Plan shall be incorporated into and enforceable under this Order. At a minimum, the updated plan shall consider the following measures:

- A. use of water mister-type dust control devices on exteriors of potentially contaminated structures
- B. periodic wetting of storage piles containing debris
- C. increased road washing and vacuum sweeping
- D. installation of temporary physical barriers around the activity site to block fugitive dust emissions

14. If the elevated action threshold, as established in paragraph 10 of this Order, is exceeded, or if air concentrations of PM₁₀ are not sustained below the baseline threshold for a period of twelve (12) continuous hours following the last measured exceedance of the baseline threshold, the Company shall immediately halt all construction activity at the site. Construction activity at the site may not resume until PM₁₀ concentrations have been reduced and remain below the baseline threshold for forty-eight (48) hours (on a continuous basis).

GENERAL PROVISIONS

15. The Company shall electronically submit all reports, plans, specifications, schedules, notifications or any other submittals required by this Order through the

MiEnviro Portal. A cover letter with each submittal shall identify the specific paragraph and requirement of this Order that the submittal is intended to satisfy.

16. This Order in no way affects the Company's responsibility to comply with any other applicable state, federal, or local laws or regulations, including without limitation, any amendments to the CAA, 42 U.S.C., Section 7401 *et seq.*, Part 55, or their rules and regulations, or the State Implementation Plan.

17. The AQD has the authority to seek statutory fines for any violation of this Order.

18. This Order, along with any supporting documentation required by the USEPA shall be submitted to the USEPA for approval as part of the maintenance plan for the Belding lead attainment area in accordance with Section 175A of the CAA. This Order shall become effective immediately upon entry, except this Order shall have no effect on the federally approved State Implementation Plan unless and until the maintenance plan (including this Order) is formally approved by the USEPA.

19. This compliance program is not a variance subject to the 12-month limitation specified in Section 5538 of Part 55, MCL 324.5538.

20. This Order shall remain in full force and effect until maintenance plan obligations for the Belding attainment area are no longer required due to the conclusion of the second maintenance period that was made effective by the USEPA's 2017 approval of the AQD's redesignation request for the Belding lead area. These second maintenance plan obligations will no longer be applicable following the last day of the second maintenance period (July 31, 2037). Thereafter, this Order shall terminate only upon written notice of termination issued by the AQD Director. Prior to issuance of a written notice of termination, the Company shall submit a request to the AQD Director, consisting of a written certification that the Company has fully complied with all the requirements of this Order. The AQD Director reserves the right to terminate this Order in lieu of receiving a written request for termination from the Company and may independently determine that the terms and conditions of this Order have been met.

21. The terms and conditions of this Order shall be binding on the Company, its successors, and assigns. In the event the Company sells or transfers the property and structures located at 302 Ashfield Street in Belding, Michigan, it shall give notice to any purchaser or transferee of the existence of this Order in connection with such sale or transfer. Within thirty (30) calendar days of such transaction, the Company shall notify the AQD Grand Rapids District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm that notice of this Order has been given to the purchaser or transferee.

22. Section 5530 of Part 55, MCL 324.5530, may serve as a source of authority but not a limitation under which this Order may be enforced. Further, Part 17 of the NREPA, MCL 324.1701 *et seq.*, and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Order.

23. The Company stipulates that it will take all lawful actions necessary to fully comply with this Order, even if the Company files for bankruptcy in the future and shall not discharge its compliance obligations under bankruptcy law.

24. The public was notified of a 30-day public comment period on this Order, which began on October 5, 2026.

The undersigned certifies that they are fully authorized by the Company to enter into this Order and to execute and legally bind the Company to it.

Mueller Brass Company

Print Name and Title

Signature

Date

Approved as to Content:

Approved as to Form:

Annette Switzer, Director
AIR QUALITY DIVISION
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES,
AND ENERGY

Margaret Bettenhausen, First Assistant
AIR AND WATER SECTION
ENVIRONMENT, NATURAL RESOURCES,
AND AGRICULTURE DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: _____

Dated: _____

FINAL ORDER

The Director of the Air Quality Division having had opportunity to review this Order and having been delegated authority to enter into Orders by the Director of the Michigan Department of Environment, Great Lakes, and Energy pursuant to the provisions of Part 55 of the NREPA and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that this Order is approved and shall be entered in the record of EGLE as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

Annette Switzer, Director
Air Quality Division

Effective Date: _____

Attachment D

Public Comment Documents



Public Notice for Air Quality Rules and State Implementation Plans

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has portions of its State Implementation Plan (SIP) and/or Air Pollution Control Rules open for comment from the public. The complete Michigan SIP is a cumulative record of hundreds of documents developed in phases and for various purposes over many years. As federal requirements change, states must add to, delete from, or revise components in the SIP. The Michigan SIP contains rules, statutes, permits, consent orders, plans, emissions inventories, and budgets. The plan also contains binding commitments to take future actions under specific circumstances: Michigan’s Air Pollution Control Rules are made up of multiple “parts,” each covering its own subject matter and/or pollutants, which often need updating. It is also possible the AQD may need to create new rules to address air quality issues in the state. More information on any actions open for comment is listed below.

The following action(s) are open for comment as indicated in their respective announcements:

Public Comment Period for Revisions to the Michigan State Implementation Plan for the Proposed Second 10-Year Maintenance Plan for the Belding Lead Area.....	1
Public Comment Period for Revisions to the Michigan State Implementation Plan for the Proposed SIP Order (No. 2026-01) for Mueller Brass Company	3

Public Comment Period for Revisions to the Michigan State Implementation Plan for the Proposed Second 10-Year Maintenance Plan for the Belding Lead Area

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) opened a public comment period for revisions to Michigan’s State Implementation Plan (SIP) on October 5, 2026, which will remain open until 11:59 p.m. EST on November 5, 2026. The purpose of the public comment period and virtual public hearing, if requested, is to allow all interested parties an opportunity to comment on the proposed SIP revision.

Proposed SIP Revision:

- [Revisions to the Michigan State Implementation Plan for the Proposed Second 10-Year Maintenance Plan for the Belding Lead Area](#)

In the proposed SIP revision, EGLE is demonstrating compliance with Section 175A(b) of the federal Clean Air Act in order to ensure that the Belding Maintenance Area will continue to attain the 2008 Lead National Ambient Air Quality Standard throughout the second 10-year maintenance period (July 31, 2027 - July 31, 2037). This second 10-year plan includes an air quality evaluation, an emissions trends analysis including future projections, a maintenance demonstration, a monitoring network evaluation, a verification of continued attainment, and an updated contingency plan.

The public is encouraged to review the proposed documents which can be found posted on our [EGLE – State Implementation Plan \(SIP\) and Attainment](#) page under *SIP Proposed Documents and Final Submittals* and present comments through the end of the public comment period. All statements received during the public comment period will be considered by the AQD. After consideration, EGLE may submit the SIP to the United States Environmental Protection Agency as written, submit it with minor revisions, or make major changes that will require another public comment period.

Submitting Comments:

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



Email your comment to OlsonJ12@Michigan.gov. Please include “Comments on Lead SMP for Belding” in the subject line.



Mail your comment to John Olson, EGLE, Air Quality Division, SIP Development Unit, P.O. Box 30260, Lansing, Michigan 48909-7760.



Or at a public hearing, if held.

If requested in writing by October 22, 2026, a virtual public hearing will be held on November 5, 2026, at 6:00 p.m. with information on how to attend posted on the AQD’s webpage at Michigan.gov/Air. If requested, the virtual public hearing may 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 revisions or who need accommodations or other assistance to effectively participate in the hearing should contact Kaitlyn DeVries at 517-599-1938 or DeVriesK1@Michigan.gov.

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

Public Comment Period for Revisions to the Michigan State Implementation Plan for the Proposed SIP Order (No. 2026-01) for Mueller Brass Company

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) opened a public comment period for revisions to Michigan's State Implementation Plan (SIP) on October 5, 2026, which will remain open until 11:59 p.m. EST on November 5, 2026. The purpose of the public comment period is to allow all interested parties an opportunity to comment on the proposed SIP revision.

Proposed SIP Revision:

- [Proposed SIP Order \(No. 2026-01\) for Mueller Brass Company](#).

EGLE is proposing to enter this Order for Mueller Brass Company and to submit it to the Michigan SIP to satisfy the Contingency Provisions requirement under Section 175A(b) of the federal Clean Air Act for the Belding Maintenance Area for the 2008 Lead National Ambient Air Quality Standard. This Order is being issued to bolster the updated contingency plan that is included within the Proposed Second 10-year Maintenance Plan for the Belding Lead Area ([Revisions to the Michigan State Implementation Plan for the Proposed Second 10-Year Maintenance Plan for the Belding Lead Area](#)).

The public is encouraged to review the proposed documents which can be found posted on our [EGLE – State Implementation Plan \(SIP\) and Attainment](#) page under *SIP Proposed Documents and Final Submittals* and present comments through the end of the public comment period. All statements received during the public comment period will be considered by the Air Quality Division (AQD). After consideration, EGLE may submit the SIP to the United States Environmental Protection Agency as written, submit it with minor revisions, or make major changes that will require another public comment period.

Submitting Comments:

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



Email your comment to OlsonJ12@Michigan.gov. Please include "SIP Order for MBC" in the subject line.



Mail your comment to John Olson, EGLE, Air Quality Division, SIP Development Unit, P.O. Box 30260, Lansing, Michigan 48909-7760.

Individuals without internet access and who are interested in receiving printed copies of the documents related to the proposed SIP revisions should contact Kaitlyn DeVries at 517-599-1938 or DeVriesK1@Michigan.gov.

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

EGLE promotes the equitable treatment and meaningful involvement of Michigan's residents regarding the development, implementation, and enforcement of laws, regulations, and policies. Equitable treatment means that no group of people bears a disproportionate share of the negative consequences resulting from governmental, industrial, or commercial operations and policies. Meaningful involvement means all people have an opportunity to participate in decisions that affect their environment and/or health.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.

Attachment E

Response to Public Comment Document