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April 21, 2026

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

Re: Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area

Dear Ms. Shuff:

The Midwest Ozone Group¹ (“MOG”) is pleased to offer these comments² regarding the “Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area (Request for Redesignation). The draft was made available for public comments by the Michigan Department of Environment, Great Lakes, and Energy’s (EGLE) Air Quality Division on March 23, 2026, with a comment deadline of April 22, 2026.

MOG is an affiliation of companies and associations that draws upon its collective resources to seek solutions to the development of legally and technically sound air quality programs that may impact on their facilities, their employees, their communities, their contractors, and the consumers of their products. MOG's primary efforts are to work with policy makers in evaluating air quality policies by encouraging the use of sound science.

MOG has been actively engaged in a variety of issues and initiatives related to the development and implementation of air quality policy, including the development of transport

¹ The members of the Midwest Ozone Group include: Ameren, American Electric Power, American Forest & Paper Association, American Iron and Steel Institute, American Wood Council, Appalachian Region Independent Power Producers Association, Associated Electric Cooperative, Berkshire Hathaway Energy, Big Rivers Electric Corp., Citizens Energy Group, City Water, Light & Power (Springfield IL), Cleveland Cliffs Inc., Council of Industrial Boiler Owners, Duke Energy Corp., East Kentucky Power Cooperative, ExxonMobil, Hoosier Energy REC, Inc., Indiana Energy Association, Indiana-Kentucky Electric Corporation, Indiana Municipal Power Agency, LGE/ KU, Marathon Petroleum Company, Monongahela Power Company, National Lime Association, North American Stainless, Nucor Corporation, Ohio Utility Group, Ohio Valley Electric Corporation, Olympus Power, Steel Manufacturers Association, and Wabash Valley Power Alliance.

² These comments were prepared with the technical assistance of Alpine Geophysics, LLC.

rules, NAAQS standards, attainment/nonattainment designations, petitions under Sections 126, 176A and 184(c) of the Clean Air Act, National Ambient Air Quality Standards (“NAAQS”) implementation guidance, the development of Good Neighbor State Implementation Plans, exceptional events and 179B demonstration, and related regional haze and climate change issues.

I. EGLE has correctly demonstrated that the seven southeast Michigan counties currently designated as marginal nonattainment, effective August 3, 2018: Wayne, Oakland, Macomb, Washtenaw, St. Clair, Livingston, and Monroe (southeast Michigan). should be redesignated to attainment.

A. Clean Air Act requires a state to show that it is in attainment of the NAAQS to qualify for redesignation.

Clean Air Act Section 107(d)(3)(E) addresses the requirements for redesignation of an area from nonattainment to attainment. The factors are as follows:

(i) the Administrator determines that the area has attained the national ambient air quality standard;

(ii) the Administrator has fully approved the applicable implementation plan for the area under section 110(k);

(iii) the Administrator determines that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the applicable implementation plan and applicable Federal air pollutant control regulations and other permanent and enforceable reductions;

(iv) the Administrator has fully approved a maintenance plan for the area as meeting the requirements of section 175A; and

(v) the State containing such area has met all requirements applicable to the area under section 110 and part D.

Clean Air Act Section 107(d)(3)(E).

Section 107(d)(3)(E) does not specifically address exceptional events, but instead, it simply requires that the NAAQS must be attained. Since it does not specify how the NAAQS must be attained, it follows that so long as the NAAQS are attained and the other factors above are met, redesignation would be proper.

When amending the Clean Air Act in 2005, Congress specifically provided that air quality monitoring data affected by exceptional events should be removed from regulatory consideration. The enactment of these provisions establishes the process by which U.S. Environmental Protection Agency (“U.S. EPA”) could exclude air quality monitoring data directly related to an exceptional event. *See* 42. U.S.C. § 7619. Subsequently, U.S. EPA promulgated the exceptional events rule. 40 C.F.R. § 50.14.

B. Exceptional events are the basis for this redesignation request.

MOG strongly supports the EGLE effort to assess the influence of US and Canadian wildfire events on the state's air quality and its ability to meet current NAAQS. The EGLE Request for Redesignation clearly demonstrates that the air quality in southeast Michigan had been impacted by smoke entering the region from wildfires in Canada during 2023 and 2025. The Request for Redesignation notes that “[d]ue to this influence, EGLE has completed additional EE demonstrations for southeast Michigan,” adding that, “[i]n February 2026, EGLE submitted to the USEPA an EE demonstration regarding impacts to the Allen Park and Detroit – East 7 Mile monitoring sites. Additionally, another EE demonstration submittal for the Oak Park and Port Huron monitoring sites was developed, and at the time of creation of this document was released for public comment.”

The Request for Redesignation also includes a commitment that “EGLE will consider and address any comments received regarding the pending EE demonstration and, if appropriate, intends to submit it to the USEPA in April of 2026. If the USEPA concurs with the EE demonstrations, the data from the Allen Park, Detroit – East 7 Mile, Oak Park, and Port Huron monitoring sites for the impacted days will be excluded from ozone season calculations for southeast Michigan 2023 through 2025 DVs. With the exclusion of the data the DVs will be at or below the 2015 ozone NAAQS and EGLE will continue to pursue redesignation.”

While Clean Air Act Section 107(d)(3)(E) addresses the requirements for redesignation of an area from nonattainment to attainment, that section does not specifically address exceptional events other than to make it clear that the NAAQS must be attained – the very conclusion of the exceptional events demonstration.

EGLE has met each of the designation requirements and more with its exceptional events demonstrations. Accordingly, MOG strongly supports Request for Redesignation.

II. While not necessary to support the current resignation request, EGLE is urged to initiate exceptional events demonstrations for all other days that impacted on the ozone air quality in the southeast Michigan nonattainment area.

In addition to supporting this redesignation with the exceptional events, we also believe it is important to submit additional exceptional events demonstrations for all of the other affected days so that the corrected DVs will be significantly lower than the 2015 ozone NAAQS, minimizing the need to invoke the maintenance plan in the future.

While EGLE has requested the exclusion of the monitored ozone concentrations measured in the southeast Michigan nonattainment area in 2023 and 2025, MOG believes that many of the top observation days in that region had ozone observations enhanced by the presence of wildfire smoke (Canadian or Mexican) and could be considered for additional exceptional event demonstration action.

While these additional dates may not be needed to demonstrate attainment with the 70-ppb ozone NAAQS, lower design values resulting from the removal of these dates could impact the

need to invoke RACT/RACM, and other requirements associated with the redesignated attainment area.

III. Conclusion

For the reasons set forth above, the Midwest Ozone Group urges EGLE to finalize its Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area for submittal to U.S. EPA for approval.

Sincerely,



Edward "Skipp" Kropp
Counsel for the Midwest Ozone Group