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Submitted via email: HengesbachS1@Michigan.gov

Stephanie Hengesbach
Michigan Department of the Environment, Great Lakes, and Energy
Air Quality Division
SIP Development Unit
P.O. Box 20360
Lansing, Michigan 48909-7760

Re: Wildfire Exceptional Events Demonstrations for
Ground-Level Ozone in Western Michigan 2015
Ozone Nonattainment Areas

Dear Ms. Hengesbach:

These comments are offered on behalf of the Midwest Ozone Group in response to the public notice of the Michigan Department of the Environment, Great Lakes, and Energy (EGLE) March 2021 draft "Wildfire Exceptional Events Demonstration for Ground-Level Ozone in the Western Michigan 2015 Ozone Nonattainment Areas of Allegan, Berrien, and Muskegon Counties – June 17-20, 2020 Episode" and the March 2021 draft "Wildfire Exceptional Events Demonstration for Ground-Level Ozone in the Western Michigan 2015 Ozone Nonattainment Areas of Allegan and Muskegon Counties – August 26, 2020 Episode". The exceptional events demonstration addresses the wildfire plumes originating from Arizona (June 2020) and California (August 2020) that adversely affected ozone in a regulatorily significant way at the Allegan, Berrien, and Muskegon County monitors.

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.¹ 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 assessment of exceptional events, the development of transport rules, NAAQS

¹ The members of and participants in the Midwest Ozone Group include: American Electric Power, American Forest & Paper Association, American Wood Council, Ameren, Alcoa, Appalachian Region Independent Power Producers Association (ARIPPA), ArcelorMittal, Associated Electric Cooperative, Big Rivers Electric Corp., Citizens Energy Group, Cleveland Cliffs, Council of Industrial Boiler Owners (CIBO), Duke Energy, East Kentucky Power Cooperative, ExxonMobil, FirstEnergy, Indiana Energy Association, Indiana Utility Group, LGE / KU, Marathon Petroleum, National Lime Association, Ohio Utility Group, Olympus Power, and City Water, Light and Power (Springfield IL).

standards, nonattainment designations, petitions under Sections 126, 176A and 184(c) of the Clean Air Act (“Act”), NAAQS implementation guidance, the development of Good Neighbor state implementation plans (SIPs) and related regional haze and climate change issues. MOG Members and Participants own and operate numerous stationary sources that are affected by the air quality ozone design values for Michigan including the implication of those results to upwind states under the Good Neighbor Provisions of the Clean Air Act. MOG seeks the development of technically and legally sound air pollution rules and actions that may impact their facilities, their employees, their contractors, and the consumers of their products.

The importance of managing Exceptional Events has and continues to be an issue of significance to MOG as a key element of managing NAAQS nonattainment implementation at the local level as well as managing the obligation of upwind states under the Good Neighbor Provisions of the Act. This is not the first time MOG has addressed the need to recognize exceptional events and their impact on Michigan. MOG has offered comment in response to the proposed Illinois Exceptional Events Demonstration of December 21, 2020 and the proposed Ohio Exceptional Events Demonstration of March 2021. On January 31, 2018, MOG offered comments to EPA’s response to certain state designation recommendations for the 2015 ozone NAAQS. 83 Fed. Reg. 651 (January 5, 2018). In those comments MOG had analyzed all the monitors in Michigan and the other states that were impacted by May and June 2016 Exceptional Events. MOG noted that data from monitors related to exceptional events initially had not been excluded from the designation analyses. This resulted in higher design values which would cause unnecessarily stringent, inaccurate nonattainment designations but also higher future year predictions of ozone concentrations.

The EGLE demonstrations address Section 319 of the Act and the related Exceptional Events Rule at 40 CFR 50.14. The Exceptional Events Rule promulgated in pursuant to Section 319 of the Act provides, “criteria and procedures for the Governor of a state to petition the Administrator to exclude air quality monitoring data that is directly due to exceptional events from use in determinations by the Administrator with respect to exceedances or violations of the national ambient air quality standards [(NAAQS)].” The EGLE demonstrations address the impact of plumes from Arizona wildfires and California wildfires that adversely affected ozone data at the Allegan, Berrien, and Muskegon County monitors. Wildfires occurred across Arizona throughout June 2020 and California in August 2020. The Michigan monitors affected by smoke transported from Arizona wildfires on June 17-20, 2020 and the California wildfires on August 26, 2020. The demonstrations appropriately urge that the data for these dates be excluded from regulatory determinations.

The EGLE exceptional events demonstrations track EPA’s regulation. Michigan provides 15 scientifically and technically based findings and evidence demonstrating the adverse air quality impact of each of the exceptional events on the three Michigan ozone monitors. These draft demonstrations serve as an example to other states as they assess their regulatory obligation to address the impact of wildfires and other similar exceptional events on the performance of their ozone monitors. MOG supports the submittal of these demonstrations to EPA.

Proposed Demonstration for Nonattainment Areas of Allegan, Berrien, and Muskegon Counties

EGLE notes the “. . . exclusion of the June 17-20, 2020 ozone data, alone or in combination with a separate August 26, 2020 exceptional event, may allow the Allegan and Berrien 2015 ozone nonattainment area (NAA) to be eligible for redesignation to attainment for the 2015 ozone National Ambient Air Quality Standard (NAAQS). . . . Exclusion of the June 17-20, 2020 ozone data would reduce the preliminary 2018-2020 design value for the Holland monitor (26-021-0014) from 72 ppb to 69 ppb thereby bringing the Allegan NAA into attainment with the 2015 NAAQS.”

EGLE also provides that, “Exclusion of the June 17-20, 2020 ozone data would reduce the preliminary 2018-2020 design value for the Coloma monitor (26-021-0014) from 72 ppb (nonattainment) to 69 ppb (attainment) thereby bringing the Berrien NAA into attainment with the 2015 ozone NAAQS.”

Additionally, EGLA provides that, “Exclusion of the June 18-20 and August 26, 2020 data may allow the Muskegon 2015 ozone nonattainment area to be eligible for one-year extension of the attainment date for the 2015 ozone NAAQS.”

Finally, EGLA provides that, “Exclusion of the June 18-20 and August 26, 2020 ozone data would reduce the preliminary 2020 4th high concentration for the Muskegon monitor (26-121-0039) from 80 ppb to 70 ppb thereby bringing the NAA below the threshold necessary to meet the criteria, as provided in in CAA section 181(a)(5) and 40 Code of Federal Regulations (CFR) 51,1107, to qualify for a 1-year attainment date extension for the 2015 ozone NAAQS.”

The draft designation clarifies that “. . . Michigan has decided to focus this demonstration only on the dates necessary to demonstrate attainment or reach 4th high MDA8 levels for eligibility for a one-extension of the 2015 ozone NAAQS attainment date and notes that if future assessment of attainment status based on inclusion of sites and dates provide lower controlling critical differences, then Michigan will revisit the analysis.” Draft Designation at p. 5. MOG applauds EGLA in its assessment of the significant role Exceptional Events play in implementation of the CAA.

EGLE provides a detailed list of key findings and evidence supporting its demonstrations concluding with the statement, “In summary, satellite images and data, meteorological data, trajectory analysis, screening tools, and speciated PM 2.5 data were used to assess whether conditions were favorable for transport of some from the Arizona wildfires to monitors that showed 8-hour ozone concentrations above 70 ppb. The data showed that during the June 2020 episode, the transported smoke degraded air quality upstream of Michigan first, this this photochemically again air mass was transported northeastward, creating a prolonged period (June 17-20, 2020) of enhanced ozone from the Mississippi River into the region, including Michigan.”

Proposed Demonstration for Nonattainment Areas of Allegan and Muskegon Counties,
August 26, 2020.

EGLE presents an additional draft demonstration that, “clearly establishes that plumes from California wildfires adversely affected ozone data in a regulatorily significant way at ozone monitors in Allegan and Muskegon Counties in Michigan during the August 26, 2020 episode. Wildfires occurred across northern California throughout August 2020 with meteorological conditions (at the surface and aloft) favorable for transport of smoke from the wildfires into the region, including Michigan, during August 26, 2020. Maximum daily 8-hour average ozone (MDA8) concentrations in parts of western Michigan on August 26 exceeded the 2015 ozone National Ambient Air Quality Standards (NAAQS) after the precursor-rich smoke plume subsided to the surface (Figure 1). Western Michigan MDA8 concentrations reached 83 ppb on the date of the event at the Muskegon and 78 ppb at the Holland (Allegan) monitor.” P. 1. The demonstration sets forth detailed findings and evidence supporting its conclusions. pp. 3-4.

MOG appreciates the opportunity to review EGLE’s Exceptional Events demonstrations and urges that the affected data be excluded from the determination of design values for the subject air quality monitors.

Very truly yours,

Kathy G. Beckett

Kathy G. Beckett
Legal Counsel for the
Midwest Ozone Group