



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 05 2015

REPLY TO THE ATTENTION OF:

Robert Irvine
Strategy Development Unit Supervisor
Michigan Department of Environmental Quality
P.O. Box 30260
Lansing, MI 48909-7760

Dear Mr. Irvine: ↗

Thank you for the opportunity to provide comments on the Proposed Sulfur Dioxide (SO₂) State Implementation Plan (SIP) for the Detroit, MI area. Air quality plans such as this provide the foundation for protecting the public from breathing unhealthy air. The U.S. Environmental Protection Agency has the following comments on your proposal:

1. As previously mentioned in our April 21, 2014 comment letter on your draft implementation plan, attainment demonstrations for the 2010 National Ambient Air Quality Standard for SO₂ must demonstrate attainment and maintenance of the SO₂ standard throughout the entire area. The air quality dispersion modeling test must demonstrate that air quality levels in all parts of the community point are expected to meet the health-based standard not just at the violating monitor locations. The current proposed plan does not show attainment throughout the entire area, and state computer modeling indicates that violations of the health-based air quality standard are expected to occur within the nearby communities. The area of maximum concentration models a value of 98.1 parts per billion (ppb), well above the Federal standard of 75 ppb. Further SO₂ reductions appear to be necessary to meet the standard and to satisfy Clean Air Act requirements.
2. As noted in our March 11, 2015 comment letter on permits 125-11B and 40-08G, technical demonstrations, including computer modeling, show that the permitted limits for the two DTE Energy power plants in the nonattainment area are not sufficient to address their contribution to the overall hotspot in the current plan. While the limits in the final permits were further tightened for an additional five percent reduction, additional reductions are still needed to show attainment throughout the entire nonattainment area.
3. The proposed plan does not include a provision for contingency measures with triggers and implementation schedules. The state's final SIP revision must contain contingency measures as required under section 172(c)(9) of the Clean Air Act.
4. To reiterate our comment from April 9, 2015 on proposed rule ORR 2014-024 EQ, the limits for U.S. Steel are consistent with the level of control needed to reach attainment. This proposed plan, however, does not include a final rule requiring those limits. Coke oven gas

desulfurization is a feasible control available to meet these limits. EPA urges MDEQ to finalize these limits.

Thank you again for the opportunity to comment. We look forward to continuing to work with you and your staff on the attainment plan for the Detroit area. If you have further questions, please contact me or Sarah Arra of my staff at 312-886-9401.

Sincerely,



Douglas Aburano
Chief
Attainment Planning and Maintenance Section