

Michigan Department  
of Natural Resources  
and Environment  
AQD Update

West Michigan Spring Conference

March 23, 2011

## Anticipated NAAQS Implementation Milestones

Pollutant	NAAQS Promulgation	Designations Effective (approximate date)	110(a) SIPs Due (3 yrs after NAAQS promulgation)	Attainment Demonstration Due	Attainment Date
PM <sub>2.5</sub> (2006)	Sept 2006	Dec 2009	Sept 2009	Dec 2012	Dec 2014/2019
Pb	Oct 2008	Nov 2010/2011 (extra time for new monitors)	Oct 2011	June 2012/2013	Nov 2015/2016
NO <sub>2</sub> (primary)	Jan 2010	Feb 2012	Jan 2013	Aug 2013	Feb 2017
SO <sub>2</sub> (primary)	June 2010	July 2012	June 2013	Jan 2014	July 2017
Ozone (all dates tentative)	Oct/Nov 2010	Late 2011	Late 2013	Spring 2014 (to be proposed)	Late 2017 (Moderate)
CO	Aug 2011	Sept 2013	Aug 2014	Mar 2015	Sept 2018
PM <sub>2.5</sub> (2011)	Oct 2011	Dec 2013	Oct 2014	Dec 2016	Dec 2018/2023
NO <sub>2</sub> /SO <sub>2</sub> Secondary	Mar 2012	Apr 2014	Mar 2015	Oct 2015	N/A

# Ozone

- 0.08 standard
- Allegan County redesignation final on September 11, 2010
- Entire state is now in attainment.

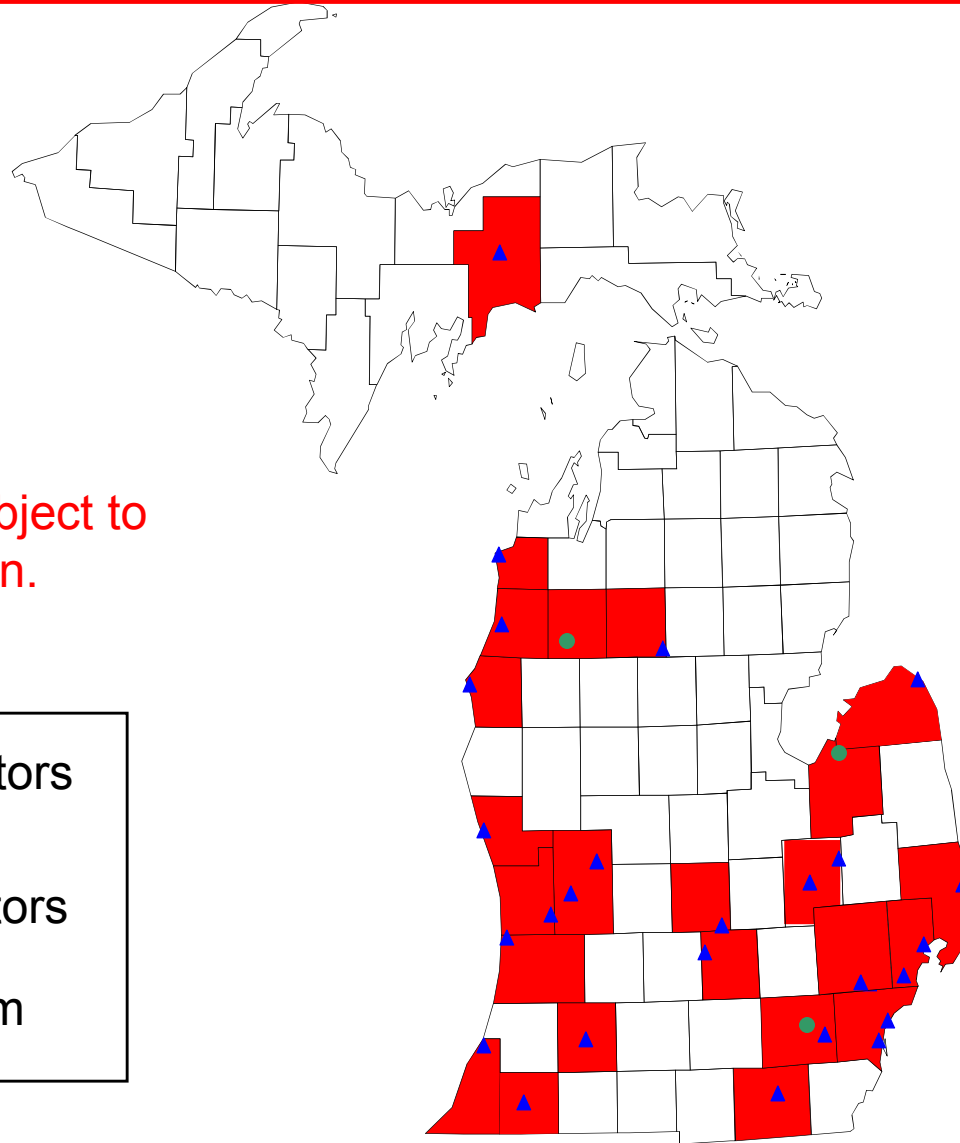
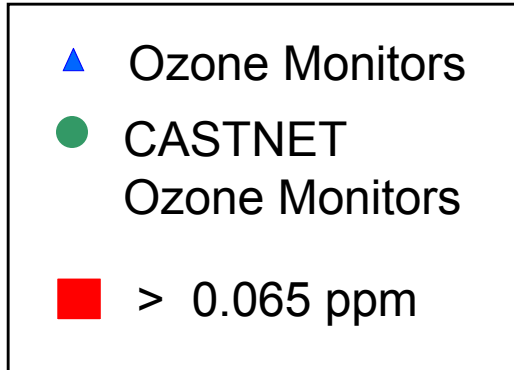
# Ozone New Standard

- At 0.065 (as rumored), all counties with monitors will exceed the standard based on years to be determined data.
- EPA went back to CAASAC for further consideration.
- New deadline for ozone standard—July 2011.
- No date for non-attainment designations by Michigan to EPA as yet.
- EPA will propose implementation guidance with new standard.

# 4<sup>th</sup> highest 8-Hr Ozone Values

Averaged over 3-Years (2008-2010)

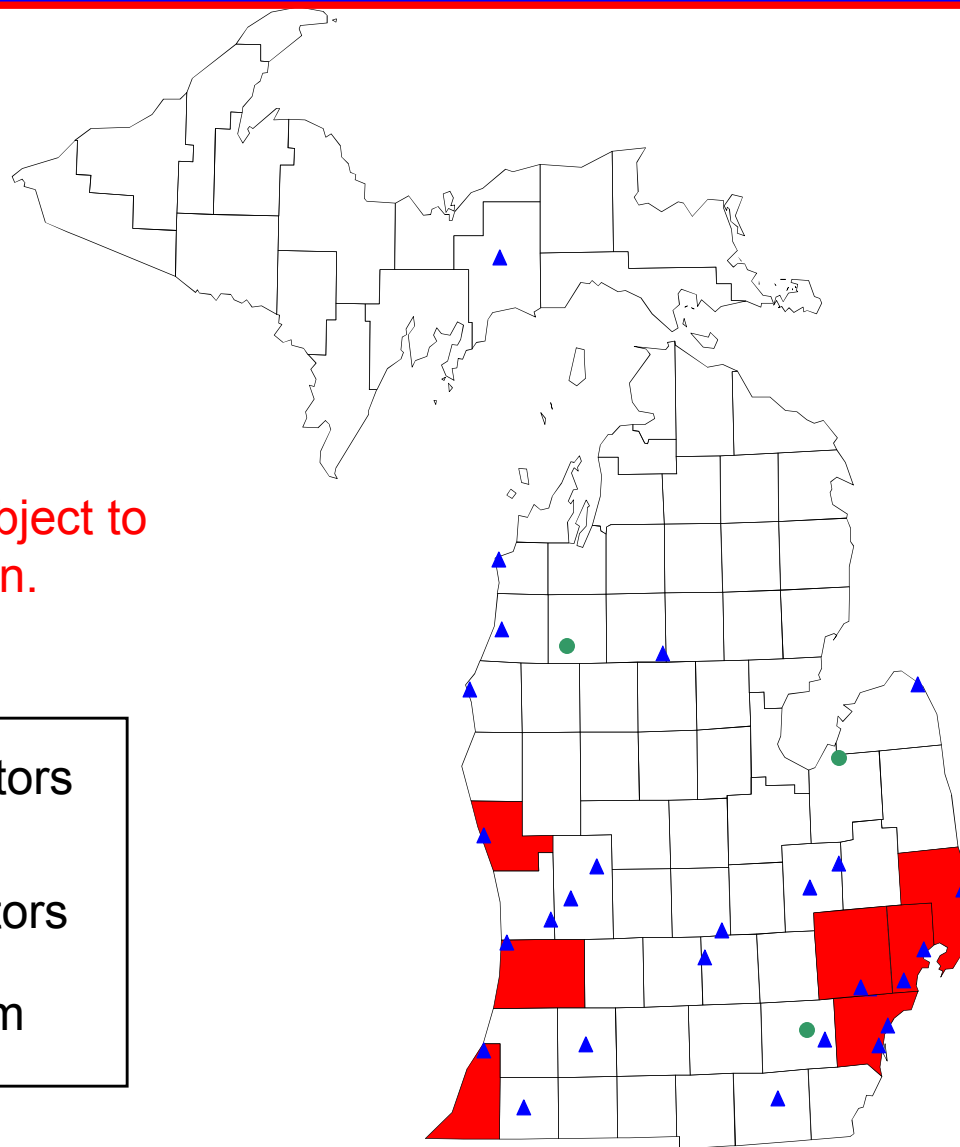
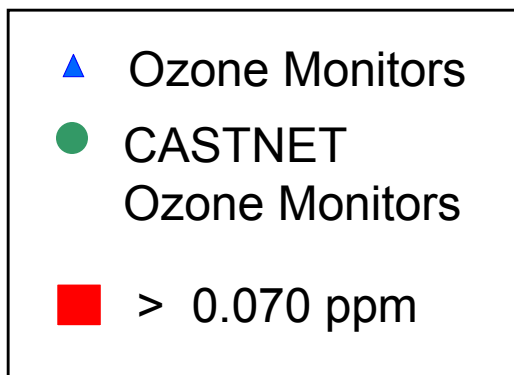
2010 data subject to validation.



# 4<sup>th</sup> highest 8-Hr Ozone Values

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# PM<sub>2.5</sub>

- Seven-county Southeast Michigan nonattainment area (includes Detroit and suburbs).
- Nonattainment for annual standard and 24-hour standard.
- Area qualifies for redesignation for both standards.
- Redesignation underway, to be submitted to the EPA in April 2011.

# New NAAQS

- One-hour SO<sub>2</sub>
  - One monitored site not attaining
  - EPA will require a monitoring plus modeling attainment demonstration
- NO<sub>2</sub>/SO<sub>2</sub> secondary standards
  - Secondary standard non-attainment areas have the same permitting implications
- One-hour NO<sub>2</sub>
  - Stationary source requirements
  - Near roadway study

# Regional Haze

- SIP was submitted to EPA in November 2010.
- Five BART-subject sources.

# Lead

- One monitor showing violations, from a single facility.
- Nonattainment designation to be recommended to the EPA by December 15, 2010.
- Additional modeling shows two other facilities require monitoring. Also monitoring is required at the Pontiac airport.

# SO<sub>2</sub>

- Begin modeling large sources to identify those exceeding new standard.
- Large source will be those permitted for 100 tpy or greater (assumption we are making at this time).
- Started modeling.
- July—August timeframe for completion of modeling.
- One monitored nonattainment area.

# Transport Rule Proposal

## Main comments:

- Timing
- FIP versus SIP
- Section 110(a)(2)(d) Assurance Provisions and Variability Calculations

## Other comments include:

- Non-EGUs
- Best Available Retrofit Technology (BART)
- Budgets and Allowances
- Small and Municipally-Owned Generators Under TR
- New Source Set-asides
- CAIR versus TR allowances
- Banking
- Fuel Adjustment Factors
- Costs of Controls
- Schedules for Scrubber and SCR Installations

# EPA Boiler and CISWI MACTs

- EPA signed rule February 21, 2011.
- Will request comment on reconsideration of the rule.
- Rule is less restrictive than the proposal.

# PSD / Tailoring Rule

- Work group met in November 2010 and began drafting language to revise current Rule 211 Renewable Operating Permit Applicability to incorporate greenhouse gas requirements. It will likely be September before the changes are submitted for rulemaking.
- July new requirements

# Renewable Operating Permit Lean Process Improvement

- Met with stakeholder groups to identify issues – MMA, Chamber, MEC
- Held workshop to redesign process – reps from Industry, Enviro Groups, DNRE
- Action Teams formed to implement process changes

# New and Improved ROP Process Highlights

- New ROP renewal application form
- Pre-application meeting
- Development of a permit timeline
- Customer surveys - after application submitted and after ROP issued
- Sharing of AQD procedures on web
- Permit processing metrics