



## **West Michigan Ozone Pollution and the Exceptional Event Demonstration**

### **1. Ozone Pollution in Allegan, Berrien, and Muskegon County Has Exceeded the National Ambient Air Quality Standard Since 2016**

Ozone, also commonly referred to as smog, is a common air pollutant that can cause harmful respiratory effects, particularly among children and the elderly. These effects commonly include the aggravation of asthma, which can lead to emergency room visits, hospitalizations, and death.

In 2015, the EPA lowered the National Ambient Air Quality Standard for ozone from 75 to 70 parts per billion. Compliance with this standard is assessed via a design value, which is calculated by averaging the fourth highest daily maximum 8-hour concentration for 3 years utilizing data from ozone air quality monitors.

In the fall of 2016, air quality monitors in Allegan, Berrien, and Muskegon counties detected levels of ozone pollution above the National Ambient Air Quality Standard. As a result, in 2018 the EPA designated the entirety of Berrien County and portions of Allegan and Muskegon counties as marginal nonattainment areas of the ozone standard.

### **2. EGLE is Submitting Two Exceptional Event Demonstrations to the EPA to Demonstrate Ozone Concentrations Between June 17-20 and August 26, 2020 Were Influenced by the California Wildfires and Should Not be Considered In Assessing Compliance with the National Ambient Air Quality Standard**

The EPA may exclude data from being used to assess compliance with a National Ambient Air Quality Standard if the State can demonstrate that an exceptional event, such as a wildfire, caused a specific air pollution concentration in excess of the Air Quality Standard.

In its Exceptional Event Demonstration, Michigan has requested that ozone data from June 17-20 and August 26, 2020, be excluded from assessing compliance with the Air Quality Standard. On these days, the maximum daily 8-hour average at each monitor was above the ozone standard of 70 parts per billion. Excluding this data would lower the design value for ozone and allow EGLE to avoid taking more stringent actions to control ozone pollution:

Impact of Excluding Ozone Data from June 17-20 and August 26 on the Ozone Design Value		
	Ozone Design Value with All Data (ppb)	Ozone Design Value Excluding Both 6/17-20 and 8/26 Data (ppb)
Allegan County	73	70
Berrien County	72	69
Muskegon County	76	72

### **3. If the EPA Approves of EGLE's Exceptional Event Demonstration, It Will Allow EGLE to Avoid Taking Additional Measures to Reduce Ozone Pollution in West Michigan**

Allegan, Berrien, and Muskegon Counties must meet the ozone National Ambient Air Quality Standard by August 3, 2021 or they will be bumped-up from marginal nonattainment areas to moderate nonattainment areas.

If both Exceptional Event Demonstrations are accepted by the EPA, then it would allow the following actions:

- Allegan and Berrien County: Would lower the ozone design value to at or below the National Ambient Air Quality Standard, which would make both counties eligible for redesignation from nonattainment to attainment.
- Muskegon County: Would make Michigan eligible for a one-year extension for meeting the ozone National Ambient Air Quality Standard in Muskegon County.

### **4. If the EPA Denies EGLE's Exceptional Event Demonstration, It May Trigger a Reclassification of Allegan, Berrien, and Muskegon County from Marginal Nonattainment to Moderate Nonattainment**

If either or both of the Exceptional Event Demonstrations are denied, it will likely result in each county failing to attain the ozone National Ambient Air Quality Standard by the Aug. 3, 2021 deadline, which would then require each county to be reclassified from marginal to moderate nonattainment status.

States must take additional measures to control ozone pollution in moderate nonattainment areas, including the following:

- Submit and implement plan for the reduction of volatile organic compound emissions of at least 15%;
- Require the implementation of reasonably available control technology for sources of volatile organic compounds in the nonattainment area;
- Require owners/operators of gasoline dispensing systems to install and operate a system for gasoline vapor recovery of emissions from the fueling of motor vehicles;
- Must implement a vehicle inspection and maintenance program;