



**Sault Tribe
Environmental
Department**

203 Greenough Street
Sault Ste. Marie
Michigan
49783

Phone
906.632.5575
Fax
906.253.1696

George Bridgers
OAQPS-AQAD-Air Quality Modeling Group
U.S. EPA Office of Air Quality Planning & Standards

November 19, 2021

**Re: Sault Tribe of Chippewa Indians, Sault Tribe Environmental Department
Comments on the Environmental Protection Agency (EPA) Office of Air and
Radiation's (OAR) Revised DRAFT Guidance for Ozone and Fine Particulate
Matter (PM) Permit Modeling Docket Number EPA-HQ-OA-2021-**

Greetings Mr. Bridgers:

The Sault Tribe Environmental Department is pleased to submit this letter in response to your invitation to provide comments on the Environmental Protection Agency's (EPA's) Revised DRAFT Guidance for Ozone and Fine Particulate Matter (PM) Permit Modeling.

The Sault Ste. Marie Tribe of Chippewa Indians is the largest tribe east of the Mississippi River (over 50,000 members strong). The main tribal reservation is in the Upper Peninsula of Michigan. The reservation is within the city limits of Sault Sainte Marie, Michigan and only a few miles south of their Canadian sister city Sault Sainte Marie, Ontario.

The city that surrounds the reservation features a population of less than 20,000 people. The Canadian side boasts a population of over 74,000 and has an integrated primary steel plant located on the St. Mary's River that separates the two sister cities. Furthermore, a ferrochrome processing facility is in the end stages of being finalized on the Sault, Canada side that will be another large contributing pollution source. The St. Mary's River is an international shipping channel that has five locks (two constructed on the US side and one on the Canadian side) that see an average of 10,000 ships passing through annually producing significant mobile source pollution, for tonnage shipped it is the busiest lock in the world. In addition, during the covid-19 pandemic our area saw a sharp increase in tourism, bringing in further mobile pollution sources to our area, and to our other small reservations that are spread out across the Eastern Upper Peninsula of Michigan.

The Sault Tribe Environmental Department appreciates the effort to address comments provided on the previous proposed guidance, and strengthen the modeling guidance to provide more conservative and protective assessments required for new or modified sources of Ozone and PM. The Sault Tribe Environmental also appreciates EPA's ongoing work to meet Executive Order 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. The Sault Tribe Environmental Department agrees more comprehensive assessment of both the precursors of Ozone and the direct emissions, and the precursor of PM is important to ensure that air quality and public health are protected.

The Sault Tribe Environmental Department appreciates that the Agency has modified the guidance for sources to make the required demonstration that the allowable emissions increase from a source or modification would not cause or contribute to any NAAQS or PSD increment violation. The Sault Environmental Department agrees that to make this demonstration, sources should provide a full accounting of the combined impacts of their allowable precursor (and direct component, in the case of PM_{2.5}) emissions on ambient concentrations of the relevant NAAQS (i.e., O₃ or PM_{2.5}) if any precursor(s) (or the direct component, in the case of PM_{2.5}) would be emitted in a significant amount.

The 2020 draft guidance relied upon a “Pollutant Applicability” approach that stated the PSD requirements for a compliance demonstration only applied to regulated NSR pollutants that would be emitted in a significant amount. This allowed the source to look only at emissions of individual O₃ and PM_{2.5} precursors/pollutants (i.e., NO_x, VOC, SO₂, and direct PM_{2.5}) and NOT sum them when determining a significant emission increase for either criteria pollutant, such that only the component of O₃ and PM_{2.5} that would by themselves be emitted by a new or modifying source in a significant amount would be included in the air quality analysis.

This revised guidance requires sources to make the required demonstration and sources should provide a full accounting of the combined impacts of their allowable precursor (and direct component, in the case of PM_{2.5}) emissions on ambient concentrations of the relevant NAAQS (i.e., O₃ or PM_{2.5}) if any precursor(s) (or the direct component, in the case of PM_{2.5}) would be emitted in a significant amount. The Sault Ste. Marie Tribe of Chippewa Indians agrees with EPA that this approach is supported both scientifically and legally.

The Sault Ste. Marie Tribe of Chippewa Indians, Environmental Department appreciates this opportunity to comment on this draft guidance. If you have any questions or require clarification please contact Kathleen Brosemer, Environmental Manager at kbrosemer@saulttribe.net, or Robin Bouschor, Environmental Specialist-Air Quality at rbouschor1@saulttribe.net.

On Behalf of the Sault Tribe Environmental Department,



Robin Bouschor
Environmental Specialist-Air Quality
Sault Tribe Environmental Department
Sault Ste. Marie Tribe of Chippewa Indians