

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

PHILLIP D. ROOS

LANSING

VIA EMAIL

TO: Representative Douglas Wozniak, Chair, JCAR

Senator Paul Wojno, Alternate Chairperson, JCAR Catherine Edwards, House Majority Policy Office Desmond Miller, Senate Majority Policy Office

Tim Reeves, Counsel, JCAR Rachel Hughart, Counsel, JCAR

FROM: Sydney Hart, Legislative Liaison, Office of Legislative Affairs

DATE: February 13, 2025

SUBJECT: Joint Committee on Administrative Rules (JCAR) Briefing Memo for Rule

Set No. 2023-14 EQ

Rules Background

Administrative Rule 336.1902 (Rule 902) was originally promulgated in 2008 and last updated in 2021. This rule incorporates the adoption by reference (ABR) material that supports the Michigan Air Pollution Control Rules (MAPCR).

Due to the broad nature of the reference material housed within Rule 902, it impacts a large variety and number of industries regulated under the MAPCR. These rules are revised as needed to reflect the most current reference material versions and prices, and to support the MAPCR.

Summary of Proposed Rule Changes

The proposed rules provide revisions and additional adopted standards to support revisions pending or completed in other rule parts developed to fulfill the ozone requirements under the federal Clean Air Act, 42 U.S.C. 7401 et seq (CAA). The proposed revisions also consist of:

- Updates to reference prices to align with what is currently offered by the respective sources, including the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD);
- Revisions to the publication dates referenced;
- References to the physical and web addresses listed in the rule to reflect the current information, and availability of these reference materials from their respective agencies.

SUBJECT: JCAR Briefing Memo for Rule Set No. 2023-14 EQ

Page 2

February 13, 2025

Stakeholder Engagement

The rules have been drafted with input from stakeholders to address their concerns as sufficiently as possible while still complying with the requirements outlined in the federal CAA. This stakeholder workgroup was originally established in late 2019 to address CAA ozone requirements, which initiated revising the Part 9 rules. The workgroup convened

periodically, both in person and virtually, to discuss work and research during the development of these rules.

The stakeholders consisted primarily of environmental consultants, facility environmental staff, environmental group representatives, academia representatives, and additional EGLE staff.

Public Engagement and Public Hearing/Comment/Information

A public hearing was held on May 22, 2024, in Constitution Hall, William Ford Conference Room, 2nd Floor, South Tower, 525 West Allegan Street, Lansing, Michigan 48933. The public hearing was also available virtually. This public hearing was for three rule packages, Part 1, Part 8, and Part 9 rules. Nine people attended the hearing in person, all of whom were EGLE staff, and nine attended virtually. Eight people spoke at the hearing; five of whom were staff members conducting the hearing. No one spoke at the hearing regarding the Part 9 rule package.

The public comment period began on April 22, 2024, and ended at 5:00 p.m. on May 22, 2024. The AQD received no written comment submittals for the Part 9 rule package.

Modifications Made Due to Public Comment

No changes were made due to public comment.

Significant Issues Not Incorporated in the Final Proposed Rules

No significant issues were brought up during the rulemaking process that did not make it into the final proposed rules.

Attachments: List of Stakeholder Group Participants

List of Public Commenters

cc/att: Phillip D. Roos, Director, EGLE

Aaron B. Keatley, Chief Deputy Director, EGLE

James Clift, Deputy Director, EGLE Travis Boeskool, Deputy Director, EGLE

Annette Switzer, EGLE Dale Shaw, EGLE Cari DeBruler, EGLE

List of Stakeholder Group Participants

Name	Affiliation
Alec Kownacki	EGLE
Alexandria Muench	Ajax Metal
Anthony Percha	GZA GeoEnvironmental, Inc.
Barry J Marietta	DTE Energy
Bob Byrnes	EGLE
Brandi Campbell	University of Michigan
Brandy Brown	EGLE
Brian Carley	EGLE
Brian Warner	Wolverine Power Cooperative
Caroline Liethen	Michigan Manufacturers Association
Carrie Brown	The Household & Commercial Products Association
Charles Dunn	Midland Cogeneration Venture
Charlie Anderson	Solutia Inc.
Chris McFarlane	TC Energy
Chris Occhipinti	NTH Consultants
Chris Waltman	TC Energy
Chris Zeigler	The American Petroleum Institute
Chuck Mills	Asphalt Pavement Association of Michigan
Cindy Smith	EGLE
Claire Linkhart	The American Petroleum Institute
Dan Zimmerman	EDL Energy (Granger)
Dana Oleniacz	Environmental Information Logistics
Dave Blatnik	Marathon Petroleum
Dave Krause	Ajax Metal
David Darling	American Coatings Association
Erica Shuff	EGLE
Frank Buono	Ajax Metal
Gary Jones	PRINTING United Alliance
Greg Myers	Marathon Petroleum
Jason Aagenes	Cleveland-Cliffs Inc.
Jason Geer	Michigan Oil and Gas Association
Jason Prentice	Consumers Energy
Jay Olaguer	EGLE
Jeff Hummel	General Motors
Jeff Pfost	Environmental Partners, Inc.
Jeffrey Korniski	EGLE

Jessica Alderton Jim Walker Consumers Energy Joe Hazewinkel Wolverine Power Cooperative John Caudell As-Needed Resources Kate Ross Consumers Energy Kelly Guertin DTE Energy Kelly Guertin Baker Selfridge ANG Base Kim Alfonsi Barr Engineering Kim Essenmacher General Motors Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Michael E. Gruber II Consumers Energy Michael Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Steven Kohl Warner Norcross + Judd LLP Wash American Coatings Association American Coatings Association American Coatings Association Regina Strong Regina Strong Reglina R	Jennifer Clark	Michigan Oil and Gas Association
Jim Walker Consumers Energy Joe Hazewinkel Wolverine Power Cooperative John Caudell As-Needed Resources Kate Ross Consumers Energy Kelly Guertin DTE Energy Kenneth Baker Selfridge ANG Base Kim Alfonsi Barr Engineering Kim Essenmacher General Motors Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges Association Regina Strong EGLE Rhett Cash American Coatings Association Rick Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering The Acuse American Council Tom Shanley EGLE Tracey McDonald EGLE Tracey McDonald FGLE Tracey McDonald Rich Lebels FGLE Tracey McDonald Rich Zavoda Clecelender Clement Steven Kohl Warner Norcross + Judd LLP Fishbeck Tracey McDonald Rich Zerosa Consumers Energy Wolverine Power Cooperative Detroit Diesel Corporation Drace Energy The Household & Commercial Products Association Rob Streight Ford Motor Company Rob Streight		
Joe Hazewinkel Wolverine Power Cooperative John Caudell As-Needed Resources Kate Ross Consumers Energy Kelly Guertin DTE Energy Kenneth Baker Selfridge ANG Base Kim Alfonsi Barr Engineering Kim Essenmacher General Motors Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Steve Walters Waste Management Steve Nohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald		
John Caudell As-Needed Resources Kate Ross Consumers Energy Kelly Guertin DTE Energy Kenneth Baker Selfridge ANG Base Kim Alfonsi Barr Engineering Kim Essenmacher General Motors Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliff's Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Steve Walters Waste Management Steve Nohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald		
Kelly Guertin DTE Energy Kenneth Baker Selfridge ANG Base Kim Alfonsi Barr Engineering Kim Essenmacher General Motors Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rick Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sararya Panneerselvam Ajax Metal Scott Venman Barr Engineering Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald FGLE Tracey McDonald Tom Shanley FGLE Tracey McDonald Tom Shanley FGLE Tracey McDonald		·
Kelly Guertin DTE Energy Kenneth Baker Selfridge ANG Base Kim Alfonsi Barr Engineering Kim Essenmacher General Motors Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald		
Kenneth Baker Selfridge ANG Base Kim Alfonsi Barr Engineering Kim Essenmacher General Motors Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald		
Kim Alfonsi Barr Engineering Kim Essenmacher General Motors Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rick Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Steve Malters Waste Management Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE		9.
Kim Essenmacher Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges Regina Strong EGLE Rhett Cash American Coatings Association Rick Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company EGLE Ryan Birkenholz Sandra Walker Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Saranya Panneerselvam Steve Walters Waste Management Steve Kohl Warner Norcross + Judd LLP Sue Kuieck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE		
Kurt Kissling Warner Norcross + Judd LLP Lillian Woolley Fishbeck Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE		
Lillian Woolley Lisa Fishbeck TCE Energy Marissa Vaerten EGLE Mark Paasche Michael E. Gruber II Michael Wood Michele Buckler Mike Lebeis DTE Energy Nicholas Georges Regina Strong Regina Strong Rick Burns Rick Burns Rob Streight Robert Irvine EGLE Ryan Birkenholz Sara Kaltunas Saranya Panneerselvam Steve Malter Steve Malter Steve Malter Steve McDonald Michael Wood Wolverine Power Cooperative Detroit Diesel Corporation DTE Energy The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Saranya Panneerselvam Ajax Metal Scott Venman Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley Tracey McDonald EGLE Tracey McDonald EGLE Tracey McDonald		
Lisa Fishbeck Marissa Vaerten BGLE Mark Paasche Michael E. Gruber II Michael Wood Michele Buckler Mike Lebeis Nicholas Georges Regina Strong Rich Zavoda Rick Burns Rob Streight Robert Irvine EGLE Ryan Birkenholz Sara Kaltunas Saranya Panneerselvam Steve Walters Steve Walters TCE Energy Molverine Power Cooperative Detroit Diesel Corporation Detroit Diesel Corporation Detroit Diesel Corporation Molverine Power Cooperative Detroit Diesel Corporation Molverine Power Cooperative Detroit Diesel Corporation Molverine Power Cooperative Detroit Diesel Corporation Detroit Diesel Corporation Detroit Diesel Corporation Detroit Diesel Corporation Detroit Diesel Corporative Detroit Diesel Corporative		
Marissa Vaerten Mark Paasche Selfridge ANG Base Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rick Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE		
Mark Paasche Michael E. Gruber II Consumers Energy Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE		3,
Michael E. Gruber II Michael Wood Michael Wood Michele Buckler Mike Lebeis DTE Energy Nicholas Georges Regina Strong Regina Strong Rich Zavoda Rick Burns Rob Streight Robert Irvine EGLE Ryan Birkenholz Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Scott Venman Stephanie Jarrett Steven Kohl Sue Kuieck Tina Reynolds Michigan Environmental Council Tom Shanley TE Drergy The Household & Commercial Products Association Rich Zavoda Cleveland-Cliffs Inc. NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Salara Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Steyen Kohl Warner Norcross + Judd LLP Sue Kuieck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald		
Michael Wood Wolverine Power Cooperative Michele Buckler Detroit Diesel Corporation Mike Lebeis DTE Energy Nicholas Georges The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE		
Michele Buckler Mike Lebeis DTE Energy Nicholas Georges Regina Strong Regina Strong Rich Zavoda Rick Burns Rob Streight Ryan Birkenholz Sandra Walker Sara Kaltunas Saranya Panneerselvam Scott Venman Stephanie Jarrett Steve Walters Waste Management Steven Kohl Sue Kuieck Tina Reynolds Michigan Environmental Council Tom Shanley The Houselor Orproration DTE Energy The Household Corproration DTE Energy The Household Corproration DTE Energy The Household Commercial Products Association Association Cleveland-Cliffs Inc. NTH Consultants Ford Motor Company Ford Motor Company EGLE Ryan Birkenholz Golder Stellantis Stellantis Sara Kaltunas Packaging Corp. of America Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald	Michael E. Gruber II	Consumers Energy
Mike Lebeis DTE Energy The Household & Commercial Products Association Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Michael Wood	Wolverine Power Cooperative
Nicholas Georges Regina Strong EGLE Rhett Cash Rich Zavoda Cleveland-Cliffs Inc. Rick Burns Rob Streight Robert Irvine EGLE Ryan Birkenholz Sandra Walker Sara Kaltunas Saranya Panneerselvam Scott Venman Stephanie Jarrett Steve Walters Waste Management Steven Kohl Sue Kuieck Tina Reynolds The Household & Commercial Products Association Anderica Cleveland-Cliffs Inc. NTH Consultants Ford Motor Company EGLE Tracey McDonald Ford Motor Company Apart Motor Company Apart Motor Company Fishbeck Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Michele Buckler	Detroit Diesel Corporation
Regina Strong EGLE Rhett Cash American Coatings Association Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Mike Lebeis	DTE Energy
Rhett Cash Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Tina Reynolds Michigan Environmental Council Tom Shanley Tracey McDonald Rmerican Coatings Association America Rotevelants Ford Motor Company Ford Motor Company Red Materian Stellentis Ford Motor Company Ford Motor Company Red Motor Company Ford Motor Company Red Materian NTH Consultants Ford Motor Company Ford Motor Company Red Motor Company Rote Motor Company Red Motor	Nicholas Georges	
Rich Zavoda Cleveland-Cliffs Inc. Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley FGLE Tracey McDonald EGLE	Regina Strong	EGLE
Rick Burns NTH Consultants Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Rhett Cash	American Coatings Association
Rob Streight Ford Motor Company Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Rich Zavoda	Cleveland-Cliffs Inc.
Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Rick Burns	NTH Consultants
Robert Irvine EGLE Ryan Birkenholz Golder Sandra Walker Stellantis Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Rob Streight	Ford Motor Company
Sandra Walker Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE		
Sara Kaltunas Packaging Corp. of America Saranya Panneerselvam Ajax Metal Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Ryan Birkenholz	Golder
Saranya Panneerselvam Scott Venman Barr Engineering Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Sandra Walker	Stellantis
Scott Venman Stephanie Jarrett Fishbeck Steve Walters Waste Management Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Sara Kaltunas	Packaging Corp. of America
Stephanie JarrettFishbeckSteve WaltersWaste ManagementSteven KohlWarner Norcross + Judd LLPSue KuieckFishbeckTina ReynoldsMichigan Environmental CouncilTom ShanleyEGLETracey McDonaldEGLE	Saranya Panneerselvam	Ajax Metal
Stephanie JarrettFishbeckSteve WaltersWaste ManagementSteven KohlWarner Norcross + Judd LLPSue KuieckFishbeckTina ReynoldsMichigan Environmental CouncilTom ShanleyEGLETracey McDonaldEGLE	Scott Venman	Barr Engineering
Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Stephanie Jarrett	
Steven Kohl Warner Norcross + Judd LLP Sue Kuieck Fishbeck Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Steve Walters	Waste Management
Tina Reynolds Michigan Environmental Council Tom Shanley EGLE Tracey McDonald EGLE	Steven Kohl	
Tom Shanley EGLE Tracey McDonald EGLE	Sue Kuieck	Fishbeck
Tom Shanley EGLE Tracey McDonald EGLE	Tina Reynolds	Michigan Environmental Council
Tracey McDonald EGLE	•	
	•	

List of Public Commenters

Name	Affiliation
N/A	N/A