

Exhibit 9

**AIR DISPERSION ANALYSIS SUMMARY
STRATEGY DEVELOPMENT UNIT, AIR QUALITY DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY**

**NMU - Ripley Heating Plant
1401 Presque Isle Ave , Marquette
0060-07 / M3792**

To: Dave Riddle
From: Steve Kish

Permit Section
Strategy Development Unit

Completed On: 5/8/2007
Date Received: 3/6/2007

Rev: -

MODEL INFORMATION

MET STN

UPPER:

ABBR

ANEM HT m:

MODEL: AERMOD

LAND USE: RURAL

DOWNWAS Yes

TERRAIN: No

Modelers Comments:

Maximum ambient impacts for PM10, CO, NOx and SO2 were evaluated by the Consultant. The only criteria pollutant to have impacts over the significance level was SO2. Thus a full impact PSD analysis was conducted for SO2 which was verified by the AQD which demonstrated that the impacts would meet the 80% PSD increment and the NAAQS.

An evaluation by the consultant was also performed using the Seasonal and Annual Cooling Tower Impact model (SACTI) to determine the potential of the proposed 7 MW cooling tower to cause an adverse fogging and icing impact to nearby roadways. One years worth of meteorological was utilized and the results indicate that no hours of either fogging or icing were predicted.

Finally, the modeling files associated with the CALPUFF Class I visibility modeling that was referenced in Consultant's submittal was requested via e-mail on 3/14/07. As of May of 2007, these files had not been received due to some apparent problems with the Consultants modeling software, thus, the AQD performed its own CALPUFF run for both of Michigan's Class I areas (Seney & Isle Royale) taking into account maximum short term SO2, NOx, and PM10 emissions rates for the existing and new boilers in g/s as shown below utilizing 3 years of met data from 2002 to 2004:

	NEW BOILER	EXISTING BOILER
SO2	11.06	10.86
NOX	2.58	2.61
PM10	0.775	0.043

The results indicate that for Isle Royale there would be 1 day in 2002 (day 243) and 1 day in 2003 (day 75) with a predicted change in light extinction coefficient greater than 5 %, In both cases the change was less than 10% which according to the 2000 FLAG Guidance Document is the level for cumulative new source growth below which the Federal Land Manager would likely not object. These results were forwarded to the Superintendent of Isle Royale on 5/4/07.

TOXICS

The consultants maximum 1 g/s ambient impacts for the new boiler stack were verified for 1hr, 8hr, 24hr, and annual averaging times and are shown in the toxics impact table.

MERCURY

The average ambient Hg ambient air concentration was determined for the nearby Deadrivier Watershed and the Forestville Reservoir based on a 5.4 lbs/yr Hg emission rate from the proposed new boiler. These

values where forward to the Toxics Unit for further evaluation as requested.

SOURCE MODELING INPUTS

SOURCE ID	SRC TYP	STK /REL HT		TEMP		VEL (m/s)	DIAM (inch)	X* (m)	Y* (m)	SOURCE	X*	Y*
		(ft)	(m)	(°F)	(K)					POINT VOL AREA	BLDG HT SIG Z X DIM	DIAM SIG Y Y DIM
B1827	POINT	134.0	40.84	289	415.9	24.96	122.4	0	3.11			
B1833	POINT	280.3	85.43	253	395.7	19.2	95.4	0	2.423			
B4261	POINT	402.7	122.74	339	443.8	22.84	117.3	0	2.98			
B4885	POINT	191.6	58.40	331	439.2	16.1	193.8	0	4.923			
EXISTSTK	POINT	160.0	48.77	250	394.3	12.22	60.0	0	1.524			
NEWBHSTJK	POINT	165.0	50.29	250	394.3	15.485	72.0	0	1.829			

POINT and VOLUME (g/s), AREA (g/s/m2)

EMISSION RATES lbs/hr

SOURCE ID	sulfur dioxide (24 hour avg.)	sulfur dioxide (24 hour avg.)
B1827	152.6	1.21E+03
B1833	39.74	3.15E+02
B4261	1272.8	1.01E+04
B4885	152.6	1.21E+03
EXISTSTK	10.859	8.62E+01
NEWBHSTJK	11.063	8.78E+01

CRITERIA POLLUTANT IMPACTS (µg/m³)

PREVENTION of SIGNIFICANT DETERIORATION

Pollutant	Avg Time	Source Impact	Sign Impact	PSD Incr	Incr Used by Facility	Src plus Incr Consmr's	Incr Used by All Incr Consmr's	X (m)	Y (m)
SO2-24	24-hr	61	5	91	67.0%	61	67.0%	469111	5156354
SO2-3	3-hr	121	25	512	23.6%	121	23.6%	469111	5156404
SO2-ANN	Annual	6.1	1	20	30.5%	6.1	30.5%	468661	5156254

NATIONAL AMBIENT AIR QUALITY STANDARD

Pollutant	Ave Time	FacI Impact + All Others	Back-Ground	Total Impact + Bkg	NAAQS
SO2-24	24-hr	222.4	13.3	235.7	365
SO2-3	3-hr	520.2	45.2	565.4	1300
SO2-ANN	Annual	31.2	2.7	33.9	80

TOXIC PREDICTED AMBIENT IMPACTS (PAI's)

CHEMICAL NAME	EMIS RATE g/s	STACK GROUP	AVG TIME	ITSL/IRSL	SCRN LEVEL	PAI (µg/m³)	%SCRN LEVEL	X (m)	Y (m)
generic	1.00E+00	NEWBHSTK	1-hr	ITSL		15.8		466861	5151904

TOXIC PREDICTED AMBIENT IMPACTS (PAI's)

CHEMICAL NAME	EMIS RATE g/s	STACK GROUP	AVG TIME	ITSL/ IRSL	SCRN LEVEL	PAI ($\mu\text{g}/\text{m}^3$)	%SCRN LEVEL	X (m)	Y (m)
generic	1.00E+00	NEWBHSTK	8-hr	ITSL		2.7		466861	5151904
generic	1.00E+00	NEWBHSTK	24-hr	ITSL		1.56		468961	5157154
generic	1.00E+00	NEWBHSTK	annual	ITSL		0.211		468961	5157154

Exhibit 10

Steve Kish - Re: NMU's tpy permit limits

From: <Jill_Webster@fws.gov>
To: "Steve Kish" <kishs@michigan.gov>
Date: 4/10/2008 5:37 PM
Subject: Re: NMU's tpy permit limits
CC: "Dolehanty, Mary Ann" <DolehantyM@michigan.gov>, <jill_webster@fws.gov>, "David Riddle" <RIDDLED@michigan.gov>, <Tracy_Casselmann@fws.gov>, <Meredith_Bond@fws.gov>

Steve,

Based on the emissions quoted in your message and the distance to the Class I area, we do not expect adverse impact to visibility or air quality related values at the Seney National Wildlife Refuge. For this project, we do not need a full Class I analysis which would include a CALPUFF modeling evaluation.

However, if these emissions should change please let us know.

Thanks.

Jill Webster, Environmental Scientist
US Fish and Wildlife Service
National Wildlife Refuge System
Branch of Air Quality
7333 W. Jefferson Ave., Suite 375
Lakewood, CO 80235-2017
(303) 914-3804
fax: (303) 969-5444

"Steve Kish" <kishs@michigan.gov>

04/10/2008 03:18 PM

To jill_webster@fws.gov
cc "David Riddle" <RIDDLED@michigan.gov>, "Dolehanty, Mary Ann" <DolehantyM@michigan.gov>
Subject NMU's tpy permit limits

Hello Jill,

I was able to look up NMU's allowable ton per year limits for the proposed new CFB Boiler from the draft permit on our web site and obtained the following amounts:

PM10 = 26.9 tpy

SO2 = 125 tpy

NOx = 89.8 tpy

The closest edge ie NW corner of the Seney Wildlife Refuge from NMU's looks like its approximately 93.5 km away. We would appreciate it if you can review this information and let us know how you would like us to proceed. thanks a lot.

Steve Kish
Environmental Engineer
Air Quality Division
Michigan Dept of Env Quality
Ph 517 335-4794
e-mail kishs@michigan.gov