



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

NOV 10 2011

Ms. Mary Ann Dolehanty
Permit Section Supervisor
Michigan Department of Environmental Quality
525 West Allegan Street
P.O. Box 30260
Lansing, Michigan 48909-7760

Dear Ms. Dolehanty,

On October 13, 2011, the U.S. Environmental Protection Agency received notification of the Michigan Department of Environmental Quality's intent to issue a Prevention of Significant Determination (PSD) construction permit for Wolverine Power Supply Cooperative, Inc.'s Sumpter Power Plant, located in Belleville, Michigan. The permit application, Permit to Install application No. 81-11, proposes to modify the Sumpter Power Plant by adding a heat recovery steam generator to the existing Unit 4 gas-fired turbine (converting it to combined-cycle operation) and by installing a new mechanical draft cooling tower and diesel fuel-fired reciprocating internal combustion engine. The existing facility is a major stationary source under PSD, and the proposed project is a major modification for emissions of nitrogen oxide, particulate matter less than 2.5 microns in size, and greenhouse gases (GHG). The proposed project is, therefore, subject to the PSD regulations in Part 18 of the Michigan Air Pollution Control Rules.

Based on our review of the draft permit, we have the following comments. We provide these comments to help ensure that the project meets Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision.

1. Under SC I.10 on page 13 of the draft permit, please add a statement to clarify that the CO₂-equivalent (CO₂e) emissions limit will account for emissions of carbon dioxide, methane, and nitrous oxide.
2. The GHG best available control technology analysis in the draft permit's Fact Sheet has a discussion of carbon capture and sequestration (CCS). On page 15 of the Fact Sheet, there is a statement that says CCS was eliminated because "the cost to generate electricity would make the system no longer competitive." In order to support this statement, please provide additional justification to substantiate your cost comment.

We appreciate the opportunity to provide comments on this draft permit. Please feel free to contact me or have your staff contact Constantine Blathras of my staff at (312) 886-0671.

Sincerely,



Genevieve Damico
Chief
Air Permits Section