



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

NOV 21 2013

REPLY TO THE ATTENTION OF:

Ms. Wilhemina McLemore
Detroit Office District Supervisor
Air Quality Division
Michigan Department of Environmental Quality
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

Dear Ms. McLemore:

The U.S. Environmental Protection Agency has reviewed the proposed renewal of the Renewable Operating Permit (ROP) for Sumpter Generation Plant, State Registration Number M4854, located in Belleville, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment.

FG-TURBINES includes a pound per hour limit for Carbon Monoxide (CO) emissions, including startups and shutdowns, pursuant to Rule 205(3). The proposed permit also requires a performance test for one of the four turbines every 12 months, as well as a general requirement to calculate CO emissions on a monthly and 12 month rolling basis. The annual performance test and the general monthly and 12 month rolling calculation requirements do not appear to be sufficient to assure compliance with the hourly CO limit, as required by 40 CFR 70.6(c)(1). Michigan Department of Environmental Quality (MDEQ) should include additional monitoring (including specific recordkeeping and calculation methods) in the permit as necessary to assure compliance with the emission limits. If necessary, MDEQ should also address any monitoring and emission calculation considerations, such as variability of emissions, maximum potential emission rates, startups and shutdowns, etc., in the Staff Report.

We appreciate the opportunity to provide comments on this proposed permit, and thank you for providing us additional time to submit these comments due to the Federal furlough. If you have any questions, please contact me or Beth Valenziano, of my staff, at (312) 886-2703.

Sincerely,


Genevieve Damico
Chief, Air Permits Section