



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

MAR 11 2015

REPLY TO THE ATTENTION OF:

Cindy Smith  
Acting Permit Section Supervisor  
Michigan Department of Environmental Quality  
Air Quality Division  
P.O. Box 30260  
Lansing, Michigan 48909-7760

Dear Ms. Smith:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft permits to install for DTE Electric Company- Trenton Channel and River Rouge Power Plants (Permit numbers 125-11B and 40-08G).

EPA has concerns about limits added in the permits for the purposes of attaining the 2010 sulfur dioxide (SO<sub>2</sub>) standard, specifically 6,938 pounds per hour (pph) on a 720-clock hour rolling average at the Trenton Channel Boiler 9A and 1890 pph and 2300 pph on a 720-clock hour rolling average at the River Rouge Boilers #2 and #3, respectively. Under EPA's April 2014 SO<sub>2</sub> Nonattainment Guidance, attainment demonstrations for the 2010 SO<sub>2</sub> standard should demonstrate future attainment and maintenance of the NAAQS in the entire area designated as nonattainment (i.e., not just at the violating monitor) by using air quality dispersion modeling to show that the mix of sources and enforceable emission rates in an identified area will not lead to a violation of the SO<sub>2</sub> NAAQS. The limits contained in the draft permits do not appear to be consistent with draft SO<sub>2</sub> modeling from MDEQ showing attainment. Given the April 2015 deadline for submission of the SO<sub>2</sub> SIP, it is very important to promptly establish appropriate SO<sub>2</sub> limits that support attainment of the health based standard throughout the nonattainment area.

Thank you again for the opportunity to comment. We look forward to continuing to work with you and your staff on the attainment demonstration for the Detroit area. If you have further questions, please contact me or Sarah Arra of my staff at 312-886-9401.

Sincerely,

A handwritten signature in cursive script, appearing to read "Douglas Aburano".

Douglas Aburano  
Chief, Attainment Planning and Maintenance Section

cc: Lynn Fiedler, MDEQ  
Barbara Rosenbaum, MDEQ  
Robert Irvine, MDEQ