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

MAY 1 9 2016

REPLY TO THE ATTENTION OF:

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

Dear Ms. Switzer:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft construction permit for DTE Gas Company Milford Compressor Station. (Permit number 185-15). We provide these comments to help ensure that the project meets the Clean Air Act requirements, that the permit will provide the 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. On Thursday, May 9, 2016, my staff held a conference call with your staff to discuss our comments. Below are our comments:

1) The October 2, 2015, permit application for the project contains a nitrogen oxides (NO_x) top-down best available control technology analysis (page 13). The analysis included control technologies such as selective catalytic reduction (SCR). The analysis states that SCR was evaluated and considered a technically feasible option. However, the analysis subsequently eliminates SCR as an option due to economic infeasibility. It is EPA's understanding that the analysis of SCR as a NO_x control option was based on each of the five simple cycle combustion turbines having its own dedicated SCR control technology. EPA review of the RACT/BACT/LAER Clearinghouse concluded that SCR has been proven in controlling NOx for simple cycle turbines which are used to generate electricity, and have been done so in an economically feasible manner. EPA believes that the applicant should consider the application of SCR control in aggregate of the emissions from the five combustion turbines combined. The application of SCR technology on these turbines would potentially reduce the emissions of NO_x from the turbines from the current draft limit of 15 parts per million (ppm) to at least 7 ppm.

2) On page 14 of the draft permit, section V. condition 3, requires testing of a single turbine (out of five) of FGTURBINES group as a representative unit once every five years. EPA recommends that this condition include a requirement that the representative unit cannot be the same unit that has been previously tested in prior tests, unless there is cause for that specific unit to be retested.

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3) EPA is aware that the meteorological data was processed using the adjust U* beta option (ADJ_U*), a non-regulatory default option available in AERMET. Use of a beta option is not a preferred modeling technique. As such, its use in the air quality impact analysis must first be approved by the EPA Regional Office (*see* 40 CFR 51 Appendix W Section 3.2). We are still evaluating the use of the ADJ_U* option in this case and have not completed our determination. We are committed to complete our review expeditiously. We request that you do not issue the permit unless and until we have approved the use of the option.

We would like to thank you again for working with us in making sure that these issues are resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras at (312) 886-0671 or Sarah Rolfes at (312) 886-6551.

Sincerely,

Genevieve Damico

Genevieve Damico, Chief
Air Permits Section