



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

REPLY TO THE ATTENTION OF:  
AR-18J

MAY 07 2009

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

Dear Ms. Dolehanty:

Thank you for the opportunity to comment on the proposed Prevention of Significant Deterioration (PSD) construction permit No. 341-07 for Consumers Energy Company. The U.S. Environmental Protection Agency has several comments, explained below.

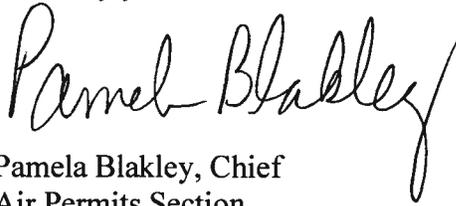
1. The start-up and shutdown operations are defined in EU-ASCPCBOILER, III. 2., but neither the proposed permit nor the statement of basis contains any discussion about eliminating or reducing excess startup/shutdown emissions. Please add the work practice requirements for startup and shutdown, including permit restrictions on the number of startup/shutdown events in an annual period.
2. The permit application (page 3-4) states that "the blends that will be selected will not exceed a 1.4 [pounds per million British thermal unit] lb/MMBtu [sulfur dioxide] SO<sub>2</sub> inlet concentration. When using 100% [Powder River Basin] PRB coal this flue gas desulfurization system inlet concentration will always be met". The draft permit is silent about the limit of SO<sub>2</sub> inlet concentration. Please add the 1.4 lb/MMBtu limit to the permit.
3. According to EU-ASCPCBOILER, II. Material Limits requirements, the source proposes to use up to 50% of bituminous coal. Therefore, please clarify the requirement VI. 10 (d) Monitoring/Recordkeeping, to include the percentage of the bituminous coal used.
4. The Best Available Control Technology (BACT) requirement is defined as "an emission limitation (including a visible emissions standard) based on the maximum degree of reduction of each regulated New Source Review pollutant ... which the reviewing authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts, and other costs, determines is achievable

for such source ... " 40 C.F.R. § 51.166(12). This definition is applicable under both the federal PSD regulations and state Rule R 336.2801. Generally, the proposed BACT limits are based on efficiencies of control technologies, but the proposed permit does not include the control efficiencies. The efficiencies of most controls are not listed, either, in the permit application (at "Summary of Emissions Calculations"). Please add them to the permit.

5. EPA requests that site-specific conditions and information be included in the additional impacts analysis to strengthen compliance with section 52.21(o) of the applicable regulations.

We look forward to continuing to work with you in resolving these issues. If you have any further questions, please contact Laura Cossa, of my staff, at 312-886-0661 or [cossa.laura@epa.gov](mailto:cossa.laura@epa.gov).

Sincerely yours,

A handwritten signature in black ink that reads "Pamela Blakley". The signature is written in a cursive style with a large, looping initial "P".

Pamela Blakley, Chief  
Air Permits Section