



MID-MICHIGAN ENERGY, LLC
c/o LS Power Development, LLC
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(636) 532-2200 · Fax (636) 532-2250

Via Overnight Mail

June 11, 2007

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AIR QUALITY DIV.

Mr. John Vial
Air Quality Division
Michigan Department of Environmental Quality
525 West Allegan Street
Lansing, Michigan

Subject: Meteorological Data Respective to Dispersion Modeling for a Major Stationary Source
Letter No: MME-MDEQ-001

Dear Mr. Vial:

Mid-Michigan Energy, LLC (MME) is proposing construction of a new coal-fired electric generating facility in Midland, Michigan. The forthcoming application for a Permit to Install (PTI) will require a dispersion modeling analysis pursuant to 40 CFR §52.21, and Michigan Rule 240. Appendix W of 40 CFR 51 (Appendix W) provides guidance on procedures for completing dispersion modeling analyses and 40 CFR §52.21 provides requirements for on-site ambient monitoring data.

Appendix W indicates that the use of five years of National Weather Service (NWS) meteorological data (met data) or at least one year of site specific met data is required. Recent PTI applications reviewed and approved by the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) in and around the Midland area subject to 40 CFR §52.21 have utilized five years of NWS met data rather than site specific met data. MME is proposing to utilize the most recent available five years of met data (2002-2006) recorded at NWS station number 14845 at the Tri-Cities Airport which is located approximately six miles from the proposed facility.

MME is requesting confirmation from the MDEQ-AQD that utilizing the NWS station met data in lieu of gathering site specific met data is acceptable.

The Clean Air Act Amendments of 1977 and subsequent revision of related EPA regulations (40 CFR §52.21(m)(1)) provide authority to obtain air quality monitoring data under the Prevention of Significant Deterioration (PSD) program. The primary purpose for the requirement to conduct pre-application ambient air monitoring is to obtain representative background pollutant concentrations to verify that existing pollutant levels do not exceed the

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applicable National Ambient Air Quality Standard (NAAQS) and as a starting point for air dispersion modeling. As stated in the Federal Register, Volume 43, Number 118 (Monday, June 19, 1978), EPA intended to focus on obtaining pre-application data in order to compare with the applicable NAAQS, stating that monitoring will only be required "as necessary".

MME respectfully requests that the MDEQ-AQD waive this pre-application monitoring requirement given the comprehensive network of existing monitoring stations that can be utilized for conservative estimates of onsite air quality and given the applicable quality, location, and currentness of the existing monitoring station data.

Should you have any questions or need additional information, please contact me at 636-532-2200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Doug Mulvey".

Douglas Mulvey, P.E.
Environmental Engineer

Cc: Jaime Boothby, Vision Environmental