



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



REBECCA A. HUMPHRIES
DIRECTOR

November 9, 2010

Dr. Susan Hedman, Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard (R-19J)
Chicago, Illinois 60604-3590

Dear Dr. Hedman:

SUBJECT: Michigan's Title V Submittal

On April 5, 2010, Mr. Bharat Mathur, Acting Administrator for U.S. Environmental Protection Agency (EPA) Region 5, sent a letter to the Michigan Department of Natural Resources and Environment (DNRE), requesting that the DNRE submit to the EPA all changes the state has made to its federally approved Title V Operating Permit Program since the original EPA approval. In that request, it was specified that the Title V Submittal (Submittal) is to identify and include any revisions to the state's authorities and regulations, including any changes to the program's fee schedule and a demonstration of the adequacy of the Title V fees to support the state's required Title V program.

As you know, Michigan implements Title V and the associated Part 70 regulations through our Renewable Operating Permit (ROP) program. Based on Michigan's original Submittal, the EPA granted interim approval to Michigan's ROP program, effective February 10, 1997. On June 1, 2001, and September 10, 2001, Michigan provided a new Submittal that completely replaced the original Submittal and addressed all identified final approval issues. The EPA granted full approval to the Michigan's ROP program on November 30, 2001. On August 18, 2003, Michigan submitted a partial update to its Submittal. The EPA's final approval of Michigan's revised Title V program was effective December 10, 2003.

Enclosed are three copies of an updated Submittal for Michigan's ROP program that addresses all changes since the Submittal of August 18, 2003. This updated Submittal completely replaces the existing Submittal and addresses all revisions to the state's authorities and regulations, including an analysis of the adequacy of Michigan's fees for implementing the ROP program.

The enclosed documentation and analysis illustrate that Michigan's current fees do not adequately fund implementation of the ROP program in Michigan. Additionally, Michigan's current Title V fee legislation expires on September 30, 2011. With the exception of the fee inadequacy, we believe this Submittal will satisfy the remaining program elements required by the federal Clean Air Act.

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Specific questions or comments regarding this Submittal can be directed to
Mr. G. Vinson Hellwig, Chief, Air Quality Division, at 517-373-7069;
hellwigv@michigan.gov; or DNRE, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Rebecca A. Humphries
Director
517-373-7917

Enclosures

cc: Ms. Cheryl Newton, EPA
Mr. Neil Gordon, Michigan Department of Attorney General
Mr. Jim Sygo, Deputy Director, Environmental Protection, DNRE
Mr. G. Vinson Hellwig, DNRE