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GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT  
LANSING



REBECCA A. HUMPHRIES  
DIRECTOR

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To Whom it May Concern:

This letter is in reference to the General Permit to Install for Diesel Fuel-Fired Engine Generators. The general permit is being suspended from use at this time due to the new federal National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO<sub>2</sub>). Any general permits previously issued for diesel-fired generators will remain in effect.

Rule 336.1201a, promulgated pursuant to Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (Rule 201a) allows the Michigan Department of Natural Resources and Environment (MDNRE) to issue a general permit to install covering similar stationary sources, processes, or process equipment, after public notice and opportunity for public participation. The use of a general permit provides a streamlined permitting alternative to the case-by-case permit to install. A general permit to install must be consistent with the permit content requirements of Rule 205(1)(a) and will contain applicability criteria and special conditions to ensure that the equipment will operate in compliance with all applicable state and federal air pollution control requirements.

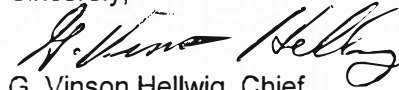
On January 22, 2010, the United States Environmental Protection Agency signed a final rule containing a new NAAQS for NO<sub>2</sub> based on a 1-hour averaging time. On April 12, 2010, 188 µg/m<sup>3</sup> became effective as the 1-hour NAAQS for NO<sub>2</sub>. The applicability criteria and special conditions in the general permit for generators have been re-evaluated to determine the impact of this new standard. Dispersion modeling was done for a hypothetical generator to determine the maximum ambient 1-hour NO<sub>2</sub> impact. A representative building and various stack parameters were used and the modeling assumed the generator stack to be an isolated facility with no other sources considered in the analysis. All alternative stacks showed a total impact to be above the 1-hour NO<sub>2</sub> NAAQS.

It has been determined that the current general permit for diesel generators does not limit NO<sub>2</sub> emissions to adequately ensure compliance with the new 1-hour NO<sub>2</sub> limit. Therefore, the general permit to install for diesel fuel-fired engine generators is being suspended from use at this time, until the applicability criteria and special conditions can be revised to ensure compliance with the new 1-hour NO<sub>2</sub> standard.

Installation of equipment prior to issuance of a permit to install, including a general permit to install, is a violation of Rule 201. Until the general permit for diesel-fired generators is revised, a case-by-case permit to install pursuant to Rule 201 should be used for diesel-fired generators.

Please feel free to contact Ms. Danita Brandt, at 517-373-7034, if you have any questions regarding this matter.

Sincerely,

  
G. Vinson Hellwig, Chief  
Air Quality Division