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GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

June 13, 2012

Ms. Lillian L. Woolley, Supervisor, Emissions Quality  
Environmental Management & Resources  
DTE Energy  
One Energy Plaza, 655 GO  
Detroit, Michigan 48226-1221

Dear Ms. Woolley:

Thank you for your letter of March 19, 2012, to the Michigan Department of Environmental Quality (DEQ) requesting a state determination that air emissions from construction activities of a new nuclear unit (Fermi 3) do not exceed State Implementation Plan (SIP) emission budgets for southeast Michigan.

The construction project requires a General Conformity Analysis since the United States Nuclear Regulatory Commission (US NRC) must approve the construction of the new unit. Section 176(c) of the Clean Air Act Amendments prohibits federal agencies from taking actions that may cause or contribute to violations of the National Ambient Air Quality Standards (NAAQS) in an area working to attain or maintain the standards.

The Fermi 3 project is located in Monroe County, which is part of the southeast Michigan nonattainment area for particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>), and also part of the southeast Michigan ozone maintenance area. Therefore, the pollutants that must not contribute to nonattainment and are subject to the General Conformity requirements are PM<sub>2.5</sub>, sulfur dioxide, nitrogen oxides, and volatile organic compounds.

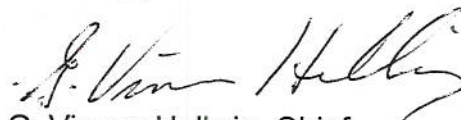
The most recent SIP revision is a July 2011 submittal to the United States Environmental Protection Agency to redesignate southeast Michigan as an attainment area for the annual and 24-hour PM<sub>2.5</sub> NAAQS. The future year emission estimates in the SIP do not include construction activity emissions from a new unit at this site. However, the Air Quality Division (AQD) has reviewed the Fermi 3 construction emissions and determined that the total of direct and indirect emissions from both construction and preconstruction would have little effect on maintenance of the ozone and PM<sub>2.5</sub> NAAQS in southeast Michigan. The Fermi 3 construction project emission projections are minimal in comparison to the most recent AQD emissions inventory for the area and the projected emissions would not exceed the emission budgets in the SIP.

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As a further safeguard against the Fermi 3 project emissions negatively impacting the SIP, the AQD will include the temporary emissions increase from the project in any future ozone and PM<sub>2.5</sub> SIPs in the affected area. This will align the emissions increase with the year of occurrence and the SIP inventory.

If you need further information or assistance, please contact Mr. Robert Rusch, AQD, at 517-373-7041 or you may contact me.

Sincerely,



G. Vinson Hellwig, Chief  
Air Quality Division  
517-373-7069

cc: Mr. Bruce Olson, US NRC  
Ms. Colette Luff, US Army Corps of Engineers  
Mr. Mike Lebeis, DTE  
Mr. Chuck Hersey, SEMCOG  
Ms. Joan Weidner, SEMCOG  
Mr. Robert Irvine, DEQ  
Mr. Robert Rusch, DEQ