



STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT

LANSING

JENNIFER M. GRANHOLM  
GOVERNOR

REBECCA A. HUMPHRIES  
DIRECTOR

April 24, 2010

Mr. Bharat Mathur  
Acting Regional Administrator  
U. S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Dear Mr. Mathur:

This letter is to acknowledge your letter of April 5, 2010, reflecting your concern and support for Michigan's Title V Renewable Operating Permit (ROP) program. As requested, Michigan will submit to Region 5 an update to Michigan's federally approved Title V program.

Pursuant to 40 CFR 70.4, Michigan provided Region 5 with a comprehensive ROP program submittal update in 2001. Since that time, Michigan has continued to fine-tune the ROP program. As a result, our Title V update will include several changes made to improve the program, changes we have previously shared with your staff for input and review during development. The input and guidance of your staff have been of significant assistance in the past and we will continue to work with Region 5 as we compile the submittal.

We are hopeful that Michigan's Legislature will soon pass legislation to ensure sufficient ROP program funding for future implementation of the ROP program. The Title V submittal will include detailed information regarding the ROP program fee structure and the associated analysis of the adequacy of those fees to support the program.

Michigan has also begun the task of using the Lean Process Improvement Methodology to re-engineer our ROP program. Our goal is to develop a more efficient, effective and streamlined ROP program that meets all Clean Air Act requirements. This effort will involve both internal and external shareholders and is projected to be completed in July-August 2010. We will soon be sending U.S. EPA Region V an invitation to participate in this Lean Process Improvement program.

In light of the current negotiations for new fee legislation, the volume of materials to be compiled, the ROP Lean Process Improvement review currently underway, and the required Department of Attorney General certification, we propose to submit the Title V program update by September 30, 2010.


Mr. Bharat Mathur

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We appreciate your willingness to work cooperatively with Michigan in support of our ROP program. If you have any questions regarding this matter, please contact Mr. G. Vinson Hellwig, Chief, Air Quality Division, at 517-373-7069 or you may contact me.

Sincerely,



Rebecca A. Humphries  
Director  
517-373-7917

cc: Mr. James Clift, Policy Director, Michigan Environmental Council  
Mr. Jim Sygo, Deputy Director, Environmental Protection, DNRE  
Ms. JoAnn Merrick, DNRE  
Mr. G. Vinson Hellwig, DNRE  
Mr. Gerald Avery, DNRE