STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

August 3, 2012

VIA U.S. MAIL AND ELECTRONIC SUBMISSION

Air and Radiation Docket Information Center
Docket ID No. EPA-HQ-OAR-2008-0708
Environmental Protection Agency
Mail Code: 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Sir or Madam:

SUBJECT: National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines; New Source Performance Standards for Stationary Internal Combustion Engines, Proposed Rule

The Michigan Department of Environmental Quality, Air Quality Division is pleased to submit the following comments on the proposed amendments to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines under Section 112 of the federal Clean Air Act.

This proposed rule would allow stationary emergency engines to operate for up to 100 hours per year to respond to emergency demand. We are concerned with this proposed increase in hours of operation. Diesel internal combustion engines comprise the vast majority of emergency generators and are far more polluting than gas simple cycle turbines and other options for distributed generation. The emission factor for nitrogen oxides for new diesel generators at 21.8 lb/MWh compares very unfavorably with the rate of 0.6 lbs/MWh for medium simple cycle turbines. (Joel Bluestein, *Emission Rates for New DG Technologies*, May 2001). These diesel generators are operated on high electricity demand days, which typically occur on the same days when ozone levels are at their highest.

To limit harmful ozone and also fine particulate impacts on those same challenging days, we encourage the U.S. Environmental Protection Agency (EPA) to more carefully tailor its rule to provide disincentives for operating diesel generators preferentially. The rule should of course avoid jeopardizing the stability and reliability of the national electric grid service. However, there are various supplemental generators that can help prevent blackouts and grid failure without having a major negative impact on air quality in urban areas. The EPA should carefully reconsider this portion of the proposal so as to not negatively impact air quality.

We thank you for the opportunity to provide comments on this matter.

Sincerely,

G. Vinson Hellwig, Chief
Air Quality Division