



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 3 ; 2017

REPLY TO THE ATTENTION OF

Heidi Hollenbach
Grand Rapids District Supervisor
Air Quality Division
Michigan Department of Environmental Quality
350 Ottawa Avenue North West, Unit 10
Grand Rapids, Michigan 49505

Dear Ms. Hollenbach:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP), for the Grand Haven Board of Light and Power - J.B. Sims Generating Station (State Registration Number B1976), located in Grand Haven, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. EU-UNIT-3_BLR Staff Report and Emission Unit Conditions. Please verify the Compliance Assurance Monitoring (CAM) applicability for each sulfur dioxide and nitrogen oxides limit in the emission limits table. In particular, see 40 Code of Federal Regulations (CFR) §64.2(b)(1)(vi), which provides an exemption for emission limitations or standards for which a part 70 permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1. As written, the current applicability analysis in the Staff Report refers instead to 40 CFR §64.2(b)(1)(iii), which provides an exemption for Acid Rain Program requirements.
2. EU-UNIT-3_BLR Staff Report and Emission Unit Conditions. Please verify CAM applicability for the 0.03 pound per mmBtu particulate matter limit, in accordance with 40 CFR §64.2, and include the CAM requirements in the permit as applicable. As written, the current applicability analysis in the Staff Report refers to the monitoring in 40 CFR Part 63, Subpart UUUUU as presumptively acceptable for CAM purposes. In accordance with 40 CFR 64.2(a)(1), units subject to both CAM exempt and nonexempt emission limitations or standards remain subject to CAM for the nonexempt limitations or standards.
3. FG-MATS Emission Unit Conditions. The Staff Report states: "the requirements in FG-MATS is overly inclusive, as requested by the applicant, so as to afford clear access to the compliance flexibility provided within [40 CFR Part 63, Subpart UUUUU]." While the permit conditions can address the compliance options provided by Subpart UUUUU, as written the permit does not clearly identify the requirements applicable to FG-MATS, including the requirements that apply when changing options.

For example, the permit includes all emission limit options (both for pollutant limits and units of measure) and definition of startup options such that any option appears available at any given time. The respective options should be clearly associated with the additional reporting, demonstration, and timing provisions in section VII, Reporting and section IX., Other Requirements.

In addition, the emission unit table does not address the applicable Time Period/Operating Scenario and associated Testing/Sampling and Monitoring/Recordkeeping requirements when the unit meets Low Emitting Electrical Generating Unit status.

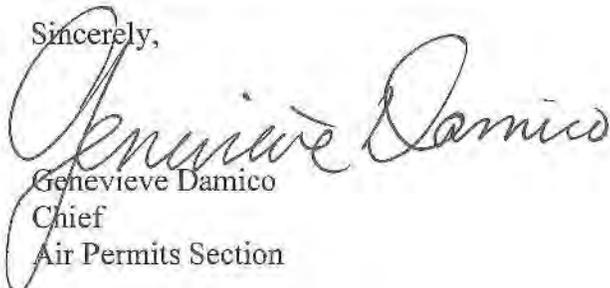
4. EU-UNIT-3_BLR, Appendix 3, Appendix 7, and Appendix 8. The draft permit contains a Time Period/Operating Scenario for certain permit conditions with the following, "Based on a 30-day rolling average of successive boiler operating days". Please identify what Michigan considered to be a successive boiler operating day. Successive is defined as "following in uninterrupted order or sequence." Please clarify in the permit whether or not the 30 rolling average would apply if/when there is a day where there is not a full boiler operating day or insufficient emission data available (see item below).

On page 51 of the draft permit, there is language stating that, "The owner or operator shall obtain emission data for at least 18 hours in at least 22 out of 30 successive boiler operating days. If this minimum data requirement can't be met with a continuous monitoring system, the owner or operator shall supplement emission data with other monitoring systems approved by the Administrator or the reference methods as described later in this section." Please clarify in the permit whether or not the condition that an operating day contain emission data for at least 18 hours is also applicable to the permit conditions where the averaging time is the 30-day successive rolling average. Furthermore, please define "operating days" in the permit as calendar days or 24 hour rolling average blocks.

5. Please refer to the enclosure for additional comments pertaining to the clarification of underlying applicable requirement citations and typographical corrections.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact Beth Valenziano, of my staff, at (312) 886-2703.

Sincerely,



Genevieve Damico
Chief
Air Permits Section

Enclosure

Enclosure:
J.B. Sims Generating Station Draft Renewable Operating Permit
Additional Corrections

- a. FG-CIEGRICEMACT. EU-EGE is subject to both the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (40 CFR Part 60 Subparts A and IIII) and the Maximum Available Control Technology for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63 Subparts A and ZZZZ). The conditions in FG-CIEGRICEMACT include the conditions from Part 63 Subpart ZZZZ but make no references to Subpart IIII. Please ensure that the requirements present in both standards cite both standards as their underlying authority. Condition III.1 on page 38, for example, should also reference 40 CFR §60.4211(f) of Subpart IIII.
- b. Appendix 8, Part B, Reporting Requirements. 40 CFR §60.49a(d) is listed as a reporting requirement. Based on the other conditions in this section, this appears to be referencing 40 CFR §60.51Da(d). However, the text present does not restate 40 CFR §60.51Da(d). Please review and revise this condition as necessary to reflect the facility's reporting requirements.
- c. The permit includes a typographical error when citing 40 CFR Part 60, Subpart Da. Please refer to the chart below for the specific permit locations.

| Page | Conditions | UAR listed is... | And should be... |
|------|--|------------------|---|
| 16 | I.1 | 60.42a(a)(1) | 60.42Da(a) |
| 16 | I.3 | 60.43a(b) | 60.43Da(b) |
| 17 | 1.4 | 60.43a(a) | 60.43Da(a) |
| 17 | I.5 | 60.44a(a)(1) | 60.44Da(a)(1) |
| 17 | I.6 | 60.42a(b) | 60.42Da(b) |
| 18 | VI.1 | 60.47a(b)(1) | 60.49Da(b)(1) |
| 18 | VI.2 | 60.47a(d) | 60.49Da(d) |
| 18 | VI.3 | 60.47a(c) | 60.49Da(c) |
| 18 | VI.4 | 60.47a(a) | 60.49Da(a) |
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(a) | 60.51Da(a) |
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(b) | 60.51Da(b) |
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(c) | 60.51Da(c) |
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(d) | 60.51Da(d) |
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(e) | 60.51Da(e) Additionally, section 60.48a referenced in this condition should be 60.50Da |
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(f) | 60.51Da(f) |

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|----|---|-----------|------------|
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(g) | 60.51Da(h) |
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(h) | 60.51Da(i) |
| 57 | Appendix 8, Part B, reporting requirements | 60.49a(i) | 60.51Da(j) |