

EPA Comment 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.

AQD Comment: EU-UNIT-3_BLR is exempt from CAM applicability for sulfur dioxide and nitrogen oxides, but the correct citation for the exemption should be 40 CFR 64.2(b)(vi) since the emission limits specify a continuous compliance determination method as part the 40 CFR Part 70 requirements. Thus the initial exemption identification was incorrect in the body of the staff report, but the exemption from CAM applicability was correct. No changes were made to the ROP as a result of this comment.

EPA Comment 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.

AQD Response: The emission limit for EU-UNIT-3_BLR is subject to the provisions of the Federal Compliance Assurance Monitoring (CAM) rule promulgated under 40 CFR Part 64 because the potential pre-control emissions are above major source thresholds and the unit relies on appropriate control device operation for compliance. There is a continuous opacity monitor (COMs) unit installed and is considered to be presumptively acceptable monitoring. However, the requirements of CAM are still applicable, and thus have been re-incorporated in the ROP. All conditions associated with CAM can be found in EU-UNIT-3_BLR.

EPA Comment 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.

AQD Response: The MATS table (FG-MATS) has been updated in accordance with MDEQ's current MATS table template. After conversations with the facility, they will be choosing some

specific requirements moving forward. The changes to the FG-MATS conditions will be updated at that time to reflect the compliance methods the facility has chosen.

EPA Comment 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-day 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 contains 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.

AQD Response: Per 40 CFR Subpart Da (60.41Da), a boiler operating day is defined as a 24-hour period between 12 midnight and the following midnight during which any fuel is combusted at any time in the steam-generating unit. It is not necessary for fuel to be combusted the entire 24-hour period. This definition applies as there was a modification to the unit in 2009. Since an operating day does not have to be an entire 24-hour period, a successive operating day is any sequential operating day where fuel is combusted for any period of time. Subpart Da goes on to state that at least 18 hours, or 75% of operating time, shall be obtained in at least 22 out of 30 successive boiler operating days for emissions data reporting. The 18 hours of operation in at least 22 out of 30 successive boiler operating days applies to the use of a continuous monitoring system. If the minimum requirement of 18 hours in a day, 22 out of 30 days cannot be met, then an alternative supplemental emissions data shall be submitted to and approved by the administrator. Thus, the 30-day rolling average time period shall include at least 18 hours in a day in 22 of 30 successive days of boiler operation where the boiler combusted fuel for any given amount of time in that day. A footnote has been added defining what a 30-day rolling average of successive boiler operating days means.

EPA Comment 5:

This comment references the enclosure where additional comments are housed pertaining to the clarification of the underlying applicable requirement (UAR) citations and typographical errors. The attachment addresses three (3) items, item a, item b, and item c and are detailed below.

EPA Comment 5a: 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. Special Condition III.1 on page 38, for example, should also reference 40 CFR 60.4211(f) of Subpart IIII.

AQD Response: EU-EGE is indeed subject to both 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 60, Subpart IIII. Conditions for 40 CFR Part 60, Subpart IIII were inadvertently left out. This has since been corrected. All applicable conditions for the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines have been included in the permit in addition to the requirements of the Maximum Achievable Control Technology for Stationary Reciprocating Internal Combustion Engines.

EPA Comment 5b: 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.

AQD Response: The conditions and reporting requirements located in Appendix 8, Part B have been updated to reflect the correct citation of 40 CFR Part 60, Subpart Da 60.51.

EPA Comment 5c:

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	1.1	60.42a(a)(1)	60.42Da(a)
16	1.3	60.43a(b)	60.43Da(b)
17	1.4	60.43a(a)	60.43Da(a)
17	1.5	60.44a(a)(1)	60.44Da(a)(1)
17	1.6	60.42a(b)	60.42Da(b)
18	VI.1	60.47a(b)(1)	60.490a(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)
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)

AQD Response: Based on further discussions with an EPA representative, Subpart Da, is an anomaly, and is the only one of the new source performance standards that reports as Da, rather than just using the second letter (a). Since the citation as is leads you to the correct spot

in the Code of Federal Regulations, the citation(s) will stay as is and not add in the additional D. However, all incorrectly numbered citations have been updated.