
From: Valenziano, Beth <valenziano.beth@epa.gov>
Sent: Monday, December 4, 2017 4:37 PM
To: DeVries, Kaitlyn (DEQ); Hollenbach, Heidi (DEQ); Ethridge, Christopher (DEQ)
Cc: Damico, Genevieve; Blathras, Constantine; Diaz, Stephanie
Subject: EPA comments re: 2nd 30 Day Public Comment Period - Grand Haven Board of Light and Power ROP Renewal (B1976)

Hello Kaitlyn, Heidi, and Chris,

Here are our comments on the second public comment period for J.B. Sims' (B1976) ROP renewal. If you have any questions, please let me know, and we can discuss further. Thank you, Kaitlyn, for the call this afternoon to go over the following. As we discussed, please note that the comments below serve to clarify the record and/or address possible misalignments when applying the applicable requirement permit templates.

Thank you!

Beth Valenziano
Air Permits Section
Air and Radiation Division
USEPA Region 5
312-886-2703

The U.S. Environmental Protection Agency has reviewed the 11/6/2017 draft Renewable Operating Permit renewal for Grand Haven Board of Light and Power, J.B. Sims, 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 and Staff Report. Section VI.15. establishes continuous opacity monitoring as the Compliance Assurance Monitoring indicator for the particulate matter emission limit in Section I.1., pursuant to 40 CFR §64.6(c)(1)(iii). Section VI.16. defines an excursion if opacity in excess of 20% is recorded for a duration exceeding two hours, pursuant to 40 CFR §64.6(c)(2). Please verify that there is an established correlation between the compliance indicator, the excursion definition, and the particulate limit in Section I.1. that it is sufficient to assure compliance with the particulate matter limit, as required by 40 CFR §70.6(a)(3)(i)(A).
2. EU-UNIT-3_BLR. Section VI.19. and VI.21. include duplicative paragraphs. Please review and update the permit language as appropriate.
3. FG-MATS, Section I. Please verify that the associated Monitoring/Testing Method column for each of the three pollutants in the emission table correctly references the appropriate Special Conditions below.
4. FG-MATS, Section I. Please verify the correct Time Period/Operating Scenario provisions for mercury, as quarterly stack test provisions apply only to filterable particulate matter and hydrogen chloride. See the most recent version of MDEQ's example template for the Mercury and Air Toxics Standards, 40 CFR subpart UUUUU.
5. FG-MATS, Section I. Please consider clarifying "LEE status," in accordance with MDEQ's Subpart UUUUU template instructions, by removing the information designated by "+" at the bottom of the emissions table.

From: Hollenbach, Heidi (DEQ) [mailto:HOLLENBACHH@michigan.gov]

Sent: Monday, November 6, 2017 7:45 AM

To: Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>; Diaz, Stephanie <diaz.stephanie@epa.gov>

Cc: DeVries, Kaitlyn (DEQ) <DeVriesK1@michigan.gov>; Ethridge, Christopher (DEQ) <ETHRIDGEC@michigan.gov>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>

Subject: 2nd 30 Day Public Comment Period - Grand Haven Board of Light and Power ROP Renewal (B1976)

A second 30-day public comment period has been initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B1976-20XX, for Grand Haven Board of Light and Power - J.B. Sims Generating Station (State Registration Number: B1976), located in Grand Haven, Ottawa County, Michigan. The public comment period begins on November 6, 2017 and will end on December 6, 2017. The original 30 day public comment period was held from May 1, 2017 through May 31, 2017. The affected state of Wisconsin is being noticed via copy of this email.

The Public Notice, Renewal ROP Application, Draft ROP, plans referenced in the ROP and the Staff Report are available through the internet. The documents are located at the following address:

http://www.deq.state.mi.us/aps/downloads/rop/pub_ntce/pub_ntce.shtml

Any comments that you could provide prior to the actual 45-day Environmental Protection Agency notice period would be appreciated. Comments can be e-mailed to Kaitlyn DeVries (devriesk1@michigan.gov), Environmental Quality Analyst, DEQ, Grand Rapids District Office. Please copy Heidi Hollenbach (hollenbachh@michigan.gov), Grand Rapids District Supervisor, DEQ and Chris Ethridge (ethridgec@michigan.gov), Field Operations Manager, DEQ.

Thanks,
Heidi

Heidi Hollenbach
Grand Rapids District Supervisor
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