

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B1976

**December 11, 2017 - STAFF REPORT
ADDENDUM**

MI-ROP-B1976-20XX

Purpose

A Staff Report dated November 6, 2017 was developed for a second public comment period in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during this second 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the November 6, 2017 draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	David Walters, General Manager 616-846-9200
AQD Contact:	Kaitlyn J. DeVries, Environmental Quality Analyst 616-558-0552

Summary of Pertinent Comments

Comments were received from the U.S. Environmental Protection Agency (EPA) and are outlined below.

EPA Comment 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).

AQD Response: The CAM plan provided by Grand Haven Board of Light and Power J.B Sims Generating Stations provides a correlation between opacity and the particulate limit. The CAM plan states that in addition to regularly having the PM emission limit tested for compliance during stack tests, the electrostatic precipitator (ESP) is operated in a range of 30 to 50 sparks per minute for the first two fields and 0 to 30 sparks per minute for the last two fields. The proper operation of the ESP, continuous monitoring of the opacity via the COMS unit, and verification during performance testing ensures compliance with the particulate matter emission limits outlined in Section I.1. A condition has been added to the ROP identifying the opacity range used to determine proper operation of the ESP under CAM.

EPA Comment 2: EU-UNIT-3_BLR. Section VI.19. and VI.21. include duplicative paragraphs. Please review and update the permit language as appropriate.

AQD Response: These two (2) paragraphs were erroneously duplicated; one has been deleted.

EPA Comment 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.

AQD Response: The associated Monitoring/Testing method column for FG-MATS, Section I was reviewed and minor changes were made to correct the references to monitoring for pollutants inadvertently cross-referenced incorrectly.

EPA Comment 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.

AQD Response: Grand Haven Board of Light and Power J.B. Sims Generating Station is complying with the provisions of the Mercury and Air Toxics Standards, 40 CFR subpart UUUUU via quarterly stack testing for filterable particulate matter and hydrogen chloride, as these pollutants did not qualify for LEE Status during the initial compliance testing. However, J.B. Sims Generating Station successfully passed the required 30-day sorbent trap testing to establish LEE status. The table has been updated to reflect the correct compliance method of annual stack testing.

EPA Comment 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.

AQD Response: Grand Haven Board of Light and Power J.B. Sims Generating Station has established LEE status for Mercury (Hg). The footnote designated by "+" has been added appropriately.

Changes to the May 1, 2017 Draft ROP

A few minor changes as a result of the aforementioned comments. In EU-UNIT-3_BLR VI. Monitoring/Recordkeeping, a condition was added stating "The permittee shall utilize COMS recorded opacity as an indicator of proper functioning of the electrostatic precipitators. The appropriate range of opacity defining proper function of the electrostatic precipitators is 0-20% opacity. **(40 CFR 64.6(c)(1)(I and ii))**". Additionally, the duplicative condition as outlined in EPA comment 2, was deleted.

Within FG-MATS, Section I had the Time Period/Operating Scenario was updated to annual stack testing with a footnote "+" designating the correct operating scenario for LEE status.