

From: [Valenziano, Beth](#)
To: [DeVries, Kaitlyn \(EGLE\)](#); [Hollenbach, Heidi \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#)
Cc: [Blathras, Constantine](#); [Damico, Genevieve](#)
Subject: EPA comments RE: 30 Day Public Comment Period - Consumers JH Campbell ROP Renewal (B2835)
Date: Tuesday, July 16, 2019 2:52:22 PM
Attachments: [image002.png](#)

Below are EPA's comments regarding the draft ROP renewal for Consumers Energy, J.H. Campbell Generating Complex. If you have any questions or would like to discuss further, please let me know.

Thank you!

Beth Valenziano

Air and Radiation Division

Air Permits Section

(312) 886-2703



The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for Consumers Energy, J.H. Campbell Generating Complex (State Registration Number: B2835), located in West Olive, 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. EUBOILER1, EUBOILER2, EUSDA_U3, and EUBYPRODUCT Compliance Assurance Monitoring (CAM) applicability. Although the Staff Report indicates that the particulate matter (PM, PM10, PM2.5) limits in EUBOILER1, EUBOILER2, EUSDA_U3, and EUBYPRODUCT are subject to the 40 CFR Part 64 CAM requirements, these respective Emission Unit sections of the permit do not associate any emissions limits with the CAM requirements. Please revise the permit as necessary to identify which pollutant specific emission units (i.e., which emission limits in EUBOILER1, EUBOILER2, EUSDA_U3, and EUBYPRODUCT) are subject to CAM, in accordance with 40 CFR §64.2(b). For example, the Monitoring/Testing Method column in the EU emissions tables could reference the applicable CAM requirements.
2. EUBOILER3 CAM exemption. The Staff Report indicates that the particulate matter limits for EUBOILER 3 are exempt from CAM because the permit includes a continuous compliance determination method. However, the permit does not include particulate matter CEMs in the respective Monitoring/Testing Method column of the emissions table. Please revise the permit as necessary to address the continuous compliance determination method exemption requirements, in accordance with 40 CFR 64.2(b)(1)(vi).
3. Staff Report, CAM nitrogen oxides and sulfur dioxides exemptions for EUBOILER1, EUBOILER2, and EUBOILER3. The Staff Report describes several exemptions from CAM for nitrogen oxides and sulfur dioxides on the basis that the units are subject to the Title IV Acid Rain Program

monitoring requirements. In accordance with 40 CFR §64.2(b), please address the CAM nonapplicability analysis for the nitrogen oxides and sulfur dioxides emission limits in EUBOILER1, EUBOILER2, and EUBOILER3 (i.e., those limits not required by Title IV). For example, it appears that the relevant exemption may be 40 CFR §64.2(b)(1)(vi)- emission limitations for which the title V permit specifies a continuous compliance determination method.

4. EUBOILER1, EUBOILER2, EUBOILER3, EUACOALHAND, EUSDA_U3, EUDSI_U12, and EUBYPRODUCT malfunction abatement plans. Please ensure that any malfunction abatement plans addressed in the permit are readily accessible in the permit record, including online Internet availability if feasible. As addressed by EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program," information cited or cross-referenced in permits should be current and readily available to the permitting agency and to the public.
5. EUACOALHAND, Section VI. Please clarify the definition of excursion, pursuant to 40 CFR 64.6(c)(2), and revise the permit or provide additional justification as appropriate. An excursion is defined for purposes of responding to exceedances or excursions. In particular:
 1. Section VI.1. does not require visible emission observations for 2 hours;
 2. the corrective actions in Section VI.5 may not be required upon observation of any visible emissions, but rather would be required only after observed emissions exceeded 2 continuous hours;
 3. the pressure drop ranges in Section VI.2 are not addressed by the definition of excursion or the corrective action provisions.
6. EUSDA_U3, Section VI. Please clarify the definition of excursion, pursuant to 40 CFR 64.6(c)(2), and revise the permit or provide additional justification as appropriate. An excursion is defined for purposes of responding to exceedances or excursions. In particular:
 1. Section VI.1. does not require visible emission observations for 2 hours;
 2. the corrective actions may not be required upon observation of any visible emissions, but rather would be required only after observed emissions exceeded 2 continuous hours.
7. EUBYPRODUCT, Section VI. Please clarify the definition of excursion, pursuant to 40 CFR 64.6(c)(2), and revise the permit or provide additional justification as appropriate. An excursion is defined for purposes of responding to exceedances or excursions. In particular:
 1. Section VI.1. does not require visible emission observations for 2 hours;
 2. the corrective actions provisions may not be required upon observation of any visible emissions, but rather would be required only after observed emissions exceeded 2 continuous hours;
 3. the pressure drop ranges in Section VI.2 are not addressed by the definition of excursion or the corrective action provisions.
8. FGBOILER12, Section VI. Please clarify the definition of excursion, pursuant to 40 CFR 64.6(c)(2), and revise the permit or provide additional justification as appropriate. An excursion is

defined for purposes of responding to exceedances or excursions. In particular:

1. the corrective action provisions may not be required when opacity readings reach 20% , but rather would be required only after two or more consecutive 1-hour block average opacity values are greater than 20%;
 2. the bag leak detection system monitoring is not addressed by either the definition of excursion or the corrective action provisions.
9. Please verify whether the following cross reference citations within the permit are correct, and revise the permit as necessary:
1. EUBOILER2, SC I.5. The particulate matter Monitoring/Testing Method refers to SC V.1 instead of SC V.2.
 2. EUBOILER3, SC VI.3. refers to I.11, I.12, I.13, I.17 and I.18 instead of I.10, I.11, I.15, and I.16.
 3. EUACI_U123, SC I.1. The opacity Monitoring/Testing Method refers to SC. VI.2 instead of SC. VI.1.
 4. EUDSI_U12, SC I.2, 3, and 4. The Monitoring/Testing Method refers to SC V.1. instead of VI.1.

From: Hollenbach, Heidi (EGLE) <HOLLENBACHH@michigan.gov>

Sent: Monday, June 17, 2019 11:11 AM

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

Cc: kristin.hart@wisconsin.gov; Richard.Wulk@Wisconsin.gov; Andrew.Stewart@wisconsin.gov; DeVries, Kaitlyn (EGLE) <DeVriesK1@michigan.gov>; Ethridge, Christopher (EGLE) <ETHRIDGEC@michigan.gov>; Orent, Kelly (EGLE) <ORENTK@michigan.gov>

Subject: 30 Day Public Comment Period - Consumers JH Campbell ROP Renewal (B2835)

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B2835-20XX, for Consumers Energy, J.H. Campbell Generating Complex (State Registration Number: B2835), located in West Olive, Ottawa County, Michigan. The public comment period begins on June 17, 2019 and will end on July 17, 2019. 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.michigan.gov/egle/0,4561,7-135-3310-389493--,00.html>

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, EGLE, Grand Rapids District Office. Please copy Heidi Hollenbach (hollenbachh@michigan.gov), Grand Rapids District Supervisor, EGLE, Chris Ethridge (ethridgec@michigan.gov), Field Operations Manager, EGLE, and Kelly Orent, (orentk@michigan.gov), EGLE.

Thanks,
Heidi

Heidi Hollenbach
Grand Rapids District Supervisor
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
616-356-0243

[Follow Us](#) | [Michigan.gov/EGLE](https://www.michigan.gov/EGLE)