

**From:** [Valenziano, Beth](#)  
**To:** [Sheehan, Meg \(EGLE\)](#); [Hare, Chris \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#)  
**Cc:** [Damico, Genevieve](#)  
**Subject:** USEPA comments re: Michigan Sugar Company - Croswell Factory 30 Day Public Notice B2876  
**Date:** Tuesday, July 23, 2019 12:28:42 PM  
**Attachments:** [image001.png](#)

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Below are EPA's comments regarding the draft ROP renewal for Michigan Sugar Company - Croswell Factory. 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

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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for Michigan Sugar Company - Croswell Factory (State Registration Number: B2876), located in Croswell, 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-PULPDRYER. SC I.2. includes a reference to SC V.3 in the Monitoring/Testing column of the emissions table. Please correct the permit as necessary, as there is no corresponding condition in Section V. of the permit.
2. EU-RILEYBLR SC I.1. includes a 0.11 lb/MMBTU NOx limit. The permit identifies SC V.1. as the associated Testing/Monitoring Method, which requires performance testing as requested by the permitting authority. Please revise the permit and/or provide further explanation in the Staff Report as appropriate to assure that the permit also includes monitoring and recordkeeping sufficient to assure compliance with this NOx limit on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1). Note that the permit also includes NOx continuous emissions monitoring pursuant to 40 CFR Part 60, Subpart Db.
3. EU-RILEYBLR SC I.3. includes an 86.24 ton/year (12 month rolling) NOx limit. The permit identifies SC VI.5. as the associated Testing/Monitoring Method, which generally requires calculations based on various types of monitoring data. Please revise the permit and/or provide further explanation in the Staff Report as appropriate to ensure that the permit includes enforceable monitoring and recordkeeping conditions (including associated calculations) sufficient to assure compliance with this NOx limit, in accordance with 40 CFR 70.6(a)(3) and (c)(1). Note that the permit also includes NOx continuous emissions monitoring pursuant to 40 CFR Part 60, Subpart Db.

4. FG-LIMEKILNS. SC VI.1. includes non-certified visible emissions monitoring and a follow up Method 9 visible emissions test if "abnormal visible emissions" are observed. Pursuant to 40 CFR 70.6(a)(3) and (c)(1), please clarify the term "abnormal visible emissions", and/or further clarify when a Method 9 observation is required, and/or include additional conditions as appropriate such that the permit includes monitoring sufficient to assure compliance with the associated opacity and particulate matter limits.
5. Staff Report, FG-SUGAR. The Staff Report indicates that the equipment permitted by PTI No. 21-15B is not yet fully constructed. Please consider expanding the information in the Staff Report to further address the timeframes for construction under Michigan's New Source Review Program. Pursuant to R 336.1201(4), if the installation, construction, reconstruction, relocation, or modification of the equipment for which the PTI has been approved has not commenced within 18 months, or has been interrupted for 18 months, the PTI shall become void unless otherwise authorized by the Department.
6. FG-SUGAR, SC I.1., 3., and 5. The lb/1,000 lbs of gas PM limits each identify SC V.1. as the associated Monitoring/Testing Method, which requires performance testing as requested by the permitting authority. Please revise the permit and/or provide further explanation in the Staff Report as appropriate to assure that the permit also includes monitoring and recordkeeping sufficient to assure compliance with these PM limits on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1). Note that sufficiency monitoring could include, for example, parametric monitoring, work practice requirements, and associated control equipment/Malfunction Abatement Plan requirements.

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**From:** Irwin, Andrea (EGLE) <IrwinA1@michigan.gov>

**Sent:** Friday, June 28, 2019 6:53 AM

**To:** Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>; Ethridge, Christopher (EGLE) <ETHRIDGEC@michigan.gov>; Orent, Kelly (EGLE) <ORENTK@michigan.gov>; Sheehan, Meg (EGLE) <SheehanM@michigan.gov>

**Cc:** Hare, Chris (EGLE) <HAREC@michigan.gov>

**Subject:** Michigan Sugar Company - Croswell Factory 30 Day Public Notice

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B2876-20XX, for Michigan Sugar Company - Croswell Factory (State Registration Number: B2876), located in Crowell, Sanilac County, Michigan. The public comment period begins on July 1, 2019 and will end on July 31, 2019.

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:

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<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 Meg Sheehan ([sheehanm@michigan.gov](mailto:sheehanm@michigan.gov)), Environmental Quality Analyst, EGLE, Bay City District Office. Please copy Chris Hare ([harec@michigan.gov](mailto:harec@michigan.gov)), Bay City District Supervisor, EGLE, Chris Ethridge ([ethridgec@michigan.gov](mailto:ethridgec@michigan.gov)), Field Operations Manager, EGLE, and Kelly Orent, ([orentk@michigan.gov](mailto:orentk@michigan.gov)), EGLE.

*Andrea Irwin*

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