

From: [Valenziano, Beth](#)
To: [Deskings, Matthew \(DEQ\)](#); [Lane, Rex \(DEQ\)](#)
Cc: [Ethridge, Christopher \(DEQ\)](#); [Orent, Kelly \(DEQ\)](#); [Damico, Genevieve](#)
Subject: EPA comments re: 30 Day Public Comment Period: Westrock California, LLC (B4072), Battle Creek, Calhoun County, Michigan
Date: Tuesday, February 26, 2019 3:13:46 PM
Attachments: [image001.png](#)

Below are EPA's comments regarding the draft ROP renewal for Westrock California, LLC (SRN B4072). 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 (ROP) renewal for Westrock California, LLC (State Registration Number B4072), located in Battle Creek, 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-FIRE-PUMP-ENGINE. Please verify whether this unit is subject to the Maximum Available Control Technology (MACT) for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63 Subparts A and ZZZZ), and include any applicable requirements and regulatory citations as appropriate, in accordance with 40 CFR §70.6(a)(1). Please note that 40 CFR §63.6590(c) provides that any affected MACT subpart ZZZZ source meeting the criteria in 40 CFR §63.6590(c) is subject to 40 CFR part 60 subpart IIII for compression ignition engines (or 40 CFR part 60 subpart JJJJ, for spark ignition engines). Subpart IIII requirements are currently included in EU-FIRE-PUMP-ENGINE.
2. FG-BOILERS. Section IX includes a table with requirements from the Industrial, Commercial, and Institutional Boilers Area Sources MACT (40 CFR Part 63 Subparts A and JJJJJ). To ensure that the permit includes all currently applicable subpart JJJJJ requirements, in accordance with 40 CFR §70.6(a)(1), please consider updating FG-BOILER to be consistent with MDEQ's MACT permit content templates.

From: Lane, Rex (DEQ) <LANER@michigan.gov>
Sent: Friday, February 1, 2019 2:01 PM
To: Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>;

JBRUSH@idem.in.gov; 'Andrew.hall@epa.ohio.gov' <Andrew.hall@epa.ohio.gov>

Cc: Ethridge, Christopher (DEQ) <ETHRIDGEC@michigan.gov>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>; Deskins, Matthew (DEQ) <DESKINSM@michigan.gov>

Subject: 30 Day Public Comment Period: Westrock California, LLC (B4072), Battle Creek, Calhoun County, Michigan

Good afternoon,

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B4072-20XX, for WestRock California, LLC (State Registration Number: B4072), located in Battle Creek, Calhoun County, Michigan. The public comment period begins on February 4, 2019 and will end on March 6, 2019. The affected states of Indiana and Ohio are 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:

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<http://www.michigan.gov/deq/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 Matt Deskins (deskinsm@michigan.gov), Environmental Quality Analyst, DEQ, Kalamazoo District Office. Please copy Rex Lane (laner@michigan.gov), Kalamazoo District Supervisor, DEQ, Chris Ethridge (ethridgec@michigan.gov), Field Operations Manager, DEQ, and Kelly Orent, (orentk@michigan.gov), DEQ.

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