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**From:** Diaz, Stephanie [mailto:diaz.stephanie@epa.gov]

**Sent:** Wednesday, September 06, 2017 6:12 PM

**To:** Elmouchi, Robert (DEQ); Zhu, Joyce (DEQ); Ethridge, Christopher (DEQ)

**Cc:** Damico, Genevieve; Valenziano, Beth; Blathras, Constantine

**Subject:** USEPA comments RE: 30-day public comment for a draft renewal of ROP for DTE - Greenwood Energy Center (B6145)

Hello Bob, Joyce, and Chris,

Per my conversation with Bob earlier today, here are my comments on DTE Greenwood. Let me know if you have any questions—I'd be happy to discuss.

Thank you!

Stephanie Diaz

EPA Region 5

Air Permits Section

312-353-1907

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP) for DTE Electric Company – Greenwood Energy Center (State Registration Number: B6145) located in Avoca, 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, page 16: Sulfur dioxide (SO<sub>2</sub>), particulate matter (PM), and nitrogen oxides (NO<sub>x</sub>) all have pounds per hour limits that do not appear to originate in the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators (40 CFR Part 60 Subpart D). Please specify the origin and authority for these conditions in accordance with 40 CFR § 70.6(a)(1)(i).
2. EUBOILER1, page 16: The PM emission limits reference SC V.2. for the monitoring/testing method. While this condition can be used to determine compliance during a performance test, the permit does not address how the permittee will show on-going compliance with any operating parameters established during the test. Is additional monitoring required for any operating parameters to assure that the permit includes sufficient monitoring in accordance with 40 CFR § 70.6(c)(1)?

This question also applies to the PM and NO<sub>x</sub> limits for EUWESTAUXBOILER.

3. EUBOILER1, page 17: The material limits associated with the used oil list the broad authority of Rule 201(3) as the underlying applicable requirement. It appears that these material limits likely originated from a state toxics rule, which would be state-only enforceable. Please review the material limits and associated requirements for EUBOILER1 to verify whether these conditions should reference footnote 2, federally enforceable pursuant to Rule 201(1)(a), or footnote 1, state only enforceable pursuant to Rule 201(1)(b) and update the underlying applicable requirement as necessary.
4. EUBOILER1, page 17: Note a of the emissions table states that the sulfur limit of R 336.1401 has been subsumed with into SC I.1. However, the Staff Report states that the ROP does not include any streamlined/subsumed requirements. Please supplement the permit record to show the process MDEQ used to determine the set of permit terms and conditions that would assure compliance with all applicable requirements for EUBOILER1 in accordance with EPA's "White Paper Number 2." This comment also applies for the streamlined/subsumed requirement for EUWESTAUXBOILER on page 26.

5. EUEASTAUXBOILER, page 22; EUWESTAUXBOILER, page 27: The NOx testing/sampling requirement (SC V.1. for EUEASTAUXBOILER and SC V.3 for EUWESTAUXBOILER) includes a high-level citation to Appendix A of 40 CFR Part 60 as the monitoring/testing method. Likewise, the PM testing/sampling requirement for EUWESTAUXBOILER (SC V.2.) also includes a high-level citation to Appendix A of 40 CFR Part 60. Please list a specific test method in accordance with 40 CFR § 70.6(a)(3).

Furthermore, these testing/sampling conditions do not include a frequency for testing. Please justify that lack of a testing schedule by explaining how compliance with applicable requirements will be assured in accordance with 40 CFR § 70.6(c)(1).

6. EUWESTAUXBOILER, page 26: Some of the PM emission limits reference SC VI.1. as the monitoring/testing method. SC VI.1. requires the verification of visible emissions. Is Method 9 the appropriate monitoring/testing method for these limits?
7. EUWESTAUXBOILER, page 26: Under time period/operating scenario for SC I.1., a note is listed. This note states that a requirement has been subsumed under this streamlined requirement and does not provide information about the time period/operating scenario associated with these limits. Please list a time period/operating scenario to be used for determining compliance with this emission limit in accordance with 40 CFR § 70.6(a)(3) and (c)(1).
8. EUWESTAUXBOILER, page 27: SC V.1. requires the permittee to analyze and record the sulfur content of the oil fuels. A similar condition for EUBOILER1 references Appendix 3.1-1 Fuel Oil Sulfur Monitoring. Please review Appendix 3.1-1 and consider if the information contained there may be relevant for compliance with the sulfur emission limits in accordance with 40 CFR §70.6(a)(3) and (c)(1).
9. FG-CTGS, page 77: The monitoring/testing method for the formaldehyde and PM limits reference SC V.6 which is not contained in the draft permit. Please review this reference and revise accordingly.
10. FG-CTGS: The Staff Report states that predictive emissions monitoring system (PEMS) are installed to measure NOx emissions from the combustion turbines. Please verify if PEMS are required as part of an applicable requirement, and update and include monitoring requirements as applicable.

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**From:** Zhu, Joyce (DEQ) [<mailto:ZHUI@michigan.gov>]

**Sent:** Monday, August 7, 2017 1:03 PM

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**Subject:** RE: 30-day public comment for a draft renewal of ROP for DTE - Greenwood Energy Center (B6145)

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B6145-201X, for DTE Electric Company - Greenwood Energy Center (State Registration Number: B6145), located in Avoca, Saint Clair County, Michigan. The public comment period begins on August 7, 2017 and will end on September 6, 2017.

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/deg/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 Robert Elmouchi ([elmouchir@michigan.gov](mailto:elmouchir@michigan.gov)), Environmental Quality Analyst, DEQ, Southeast Michigan District Office. Please copy Joyce Zhu ([zhuj@michigan.gov](mailto:zhuj@michigan.gov)), Southeast Michigan District Supervisor, DEQ and Chris Ethridge ([ethridgec@michigan.gov](mailto:ethridgec@michigan.gov)), Field Operations Manager, DEQ.