

**From:** [Valenziano, Beth](#)  
**To:** [Karl, Matthew \(EGLE\)](#); [Hare, Chris \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#)  
**Cc:** [Ogulei, David](#); [Blathras, Constantine](#)  
**Subject:** EPA comments re: B6527 - Midland Cogeneration Venture 30 Day Public Notice  
**Date:** Thursday, September 26, 2019 3:39:09 PM  
**Attachments:** [image001.png](#)

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Hello Matt, Chris, Chris, and Kelly,

Below are EPA's comments regarding the draft renewal ROP for Midland Cogeneration Venture. 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 Midland Cogeneration Venture (State Registration Number: B6527), located in Midland, 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. Please verify whether any of the units at Midland Cogeneration Venture are subject to the Acid Rain Program, pursuant to 72.6(a), and include any relevant information in the Staff Report. The Title V permit is required to include any applicable acid rain requirements, in accordance with 40 CFR 70.6(a)(1) and 40 CFR Parts 72.50 and 72.51.
2. Staff Report, EU-TURBINE12 Streamlining. The Staff Report indicates that EU-TURBINE1, Condition I.1. streamlines the NOx emission limit in 40 CFR 60.332(a)(1) and the 98 pound/hour BACT limit. Although the Staff Report generally states that the BACT limit is more stringent, it does not provide supporting information comparing the specific NSPS concentration limit and the BACT limit. Please supplement the Staff Report as necessary to support EGLE's determination that the NSPS limit may be subsumed under this BACT limit, in accordance with EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program" and EGLE's "Staff Guidance on Streamlined/Subsumed Requirements in ROPs."
3. Staff Report, FG-SITURBINES Streamlining. The Staff Report indicates that FG-SITURBINES, Condition I.1. streamlines the NOx emission limit in 40 CFR 60.332(a)(1) and the 159 pound/hour BACT limit. Although the Staff Report generally states that the BACT limit is more

stringent, it does not provide supporting information comparing the specific NSPS concentration limit and the BACT limit. Please supplement the Staff Report as necessary to support EGLE's determination that the NSPS limit may be subsumed under this BACT limit, in accordance with EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program" and EGLE's "Staff Guidance on Streamlined/Subsumed Requirements in ROPs."

4. FG-BOILERS1-6, conditions I.1., I.2., and I.3. These PM and PM10 limits identify 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 these PM and PM10 limits on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
5. FG-BOILERS1-6, conditions I.10. and I.11. These VOC limits identify 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 these VOC limits on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
6. FG-BOILERS1-6, condition I.12. This opacity limit does not identify any associated Testing/Monitoring Method. 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 the opacity limit, in accordance with any monitoring required by the underlying applicable requirements as well as 40 CFR 70.6(a)(3) and (c)(1).
7. FG-BOILERMACT includes conditions required by the Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR Part 63, Subpart DDDDD. To ensure consistency, clarity, and to assure that the permit includes all applicable requirements (including startup/shutdown provisions and updated electronic submittal provisions) pursuant to 40 CFR 70.6(a)(1), please consider updating this section of the permit in accordance with the most recent Michigan EGLE's MACT permit condition templates. In particular, see Conditions III.7., VI.4., VI.5, and VII.18 in EGLE's Existing Gas 1 Template.
8. FG-TURB/DB12, condition I.2. This CO limit identifies SC V.1. as the associated Testing/Monitoring Method, which requires performance testing every 5 years. 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 the CO limit on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
9. FG-TURB/DB12, conditions I.7 and I.8. These opacity limits identify SC V.2 and SC VI.6. as the associated Testing/Monitoring Method, which require a certified visible emission reading

every six months. 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 opacity limits on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

In addition, note that FG-TURB/DB12, condition I.7 may be missing a "footnote 2" designation.

10. FG-SITURBINES, condition I.2. This CO limit identifies SC V.1. as the associated Testing/Monitoring Method, which requires performance testing every 2 years for one of the turbines. 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 the CO limit on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
11. FG-SITURBINES, conditions I.8 and I.9. These opacity limits identify SC V.2 and SC VI.3. as the associated Testing/Monitoring Method, which require a certified visible emission reading every six months. 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 opacity limits on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
12. FG-SITURB/DB, condition I.2. This CO limit identifies SC V.1. as the associated Testing/Monitoring Method, which requires performance testing every 2 years for one of the turbines and respective duct burner. 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 the CO limit on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
13. FG-SITURB/DB, condition I.7. and I.8. These opacity limits identify SC V.2 and SC VI.6. as the associated Testing/Monitoring Method, which require a certified visible emission reading every six months. 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 opacity limits on an ongoing basis, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
14. Appendix 9, Cross State Air Pollution Rule (CSAPR) Trading Program Title V Requirements. The Description of CSAPR Monitoring Provisions section includes a unit identified as Unit 12 (EU-T12). This appears to be a reference to the unit identified elsewhere in the permit as EU-TURBINE12. In addition, the section includes a unit identified as Unit 15 (EU-T15). However, EU-T15 is not included in any other section of the permit. Please revise Appendix 9 as necessary to correctly identify the emission units subject to CSAPR.

**Sent:** Friday, August 30, 2019 6:00 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>; Hare, Chris (EGLE) <HAREC@michigan.gov>; Orent, Kelly (EGLE) <ORENTK@michigan.gov>

**Cc:** Karl, Matthew (EGLE) <KarlM@michigan.gov>

**Subject:** B6527 - Midland Cogeneration Venture 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-B6527-20XX, for Midland Cogeneration Venture (State Registration Number: B6527), located in Midland, Midland County, Michigan. The public comment period begins on September 2, 2019 and will end on October 2, 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 Matthew Karl ([karlm@michigan.gov](mailto:karlm@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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