

From: Diaz, Stephanie
To: [Lazzaro, April \(DEQ\)](#); [Hollenbach, Heidi \(DEQ\)](#); [Ethridge, Christopher \(DEQ\)](#); [Orent, Kelly \(DEQ\)](#)
Cc: [Valenziano, Beth](#); [Damico, Genevieve](#); [Blathras, Constantine](#)
Subject: RE: 30 Day Public Comment Period - Kent County Waste-to-Energy Facility (N1604)
Date: Wednesday, March 7, 2018 4:01:32 PM

Hello April, Heidi, and Chris,

Here are my comments for the Kent County Waste-to-Energy draft ROP. April, I'll be sending you a follow up email shortly with the additional information I mentioned during our call. If you have any questions, I'd be happy to discuss!

Enjoy the rest of your day!

Stephanie Diaz
EPA Region 5 – Air Permits Section
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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit for Kent County Waste-to-Energy Facility, State Registration Number N1604, located in Grand Rapids, MI. 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 clarify in the Staff Report the applicability of 40 CFR Part 60, Subpart Cb and 40 CFR Part 62, Subpart FFF to this source.
2. FG-COMBUSTORS: Please verify the underlying applicable requirements for the streamlined particulate matter (PM), cadmium, mercury, and lead limits.
3. EU-ASHSYSTEM and FG-COMBUSTORS: Please verify that the emissions limits, testing requirements, and monitoring requirements originating from 40 CFR Part 60, Subpart FFF cite the correct underlying applicable requirements.
4. FG-COMBUSTORS: Various testing/sampling and monitoring conditions in the permit state that they are being used for compliance with emissions limits from 40 CFR Part 60, Subpart Eb. Though the testing and monitoring requirements from 40 CFR Part 60, Subpart Eb are incorporated by reference by 40 CFR Part 62, Subpart FFF and therefore apply to the source, the emissions limits from the 40 CFR Part 60, Subpart Eb do not. Please revise these conditions as necessary to ensure that they refer to the correct applicable emissions limit.
5. 40 CFR Part 60, Subpart Db applicability for FG-COMBUSTORS: Page 5 of the Staff Report states that this source is not subject to the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units. However, SC II.2 and II.3 for FG-COMBUSTORS cite the NSPS as an underlying applicable requirement. Please verify the

applicability of 40 CFR Part 60, Subpart Db to this source and revise the permit as necessary to list the appropriate underlying applicable requirements in accordance with 40 CFR §70.6(a)(1). This also applies to SC VI.42 and SC IX.2 for FG-COMBUSTORS.

6. CAM applicability for NO_x limits for FG-COMBUSTORS: According to page 6 of the Staff Report, EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) are not subject to Compliance Assurance Monitoring (CAM) because the control device is not needed to meet the pounds per hour oxides of nitrogen (NO_x) limits. However, these emissions units are also subject to concentration NO_x limits. Please verify CAM applicability for these concentration limits, in accordance with 40 CFR §64.2(a), and include CAM requirements in the permit as applicable.
7. CAM applicability for SO₂ limits for FG-COMBUSTORS: The current applicability analysis in the Staff Report states that SO₂ limits derived from New Source Review are exempt from CAM because the FG-COMBUSTORS is subject to an NSPS. However, FG-COMBUSTORS is not subject to an NSPS. Please verify CAM applicability for the various SO₂ limits established during New Source Review in accordance with 40 CFR §64.2 and include the CAM requirements in the permit as applicable.
8. EU-ASHSYSTEM, SC I.1: This limit originates from 40 CFR 62.14106(a) which lists the required observation period as 9 minutes per 3-hour period. In order to ensure the practical enforceability of this permit condition, please revise the condition to include the specific observation period.
9. FG-COMBUSTORS, SC I.24: This pounds per hour HCl limit has a footnote 2 designation, but page 6 of the Staff Report indicates that this limit is not federally enforceable. Please review this limit to verify whether the "footnote 1" state enforceable-only designation or the "footnote 2" designation is correct, and revise the permit as appropriate. See R 336.1214a(3).
10. Staff Report, page 8: The Staff Report states that SC II.5 and SC III.6 for FG-COMBUSTORS are being streamlined, but there does not appear to be a subsumed requirement. Please clarify whether or not these conditions are being streamlined.

From: Hollenbach, Heidi (DEQ) [mailto:HOLLENBACHH@michigan.gov]

Sent: Monday, February 5, 2018 9:17 AM

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

Cc: Lazzaro, April (DEQ) <LAZZAROA@michigan.gov>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>; Ethridge, Christopher (DEQ) <ETHRIDGEC@michigan.gov>

Subject: 30 Day Public Comment Period - Kent County Waste-to-Energy Facility (N1604)

A 30-day public comment period is being initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-N1604-20XX, for Kent County Waste-to-Energy Facility (State Registration Number: N1604), located in Grand Rapids, Kent County, Michigan. The public comment period begins on February 5, 2018 and will end on March 7, 2018.

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/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 April Lazzaro (lazzaroa@michigan.gov), Senior Environmental Quality Analyst, DEQ, Grand Rapids District Office. Please copy Heidi Hollenbach (hollenbachh@michigan.gov), Grand Rapids District Supervisor, DEQ and Chris Ethridge (ethridgec@michigan.gov), Field Operations Manager, DEQ.

Thanks,
Heidi

Heidi Hollenbach
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