

From: Valenziano, Beth
To: [McCann, Gina \(DEQ\)](#); [Hare, Chris \(DEQ\)](#); [Ethridge, Christopher \(DEQ\)](#); [Orent, Kelly \(DEQ\)](#)
Cc: [Blathras, Constantine](#); [Damico, Genevieve](#)
Subject: RE: N5985 Whitefeather Landfill/EDP - 30 Day Public Comment Notice
Date: Thursday, December 6, 2018 2:14:23 PM
Attachments: [image001.png](#)

Below are EPA's comments regarding the draft ROP renewal for Whitefeather Landfill/EDP (SRN N5985). 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 (ROP) renewal for Whitefeather Landfill/EDP (State Registration Number N5985), located in Pinconning, Bay County, 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. Section 1.E. This section includes a non-applicability permit shield for 40 CFR Part 60, Subpart XXX, on the basis that the landfill did not undergo construction, reconstruction, or modification after July 17, 2014. In accordance with 40 CFR 70.6(f)(1)(ii), the permitting authority can grant a non-applicability permit shield provided that there is a determination that the requirements specifically identified are not applicable to the source. In order to meet the non-applicability permit shield requirements, please provide specific information supporting the broadly-based negative declaration, and narrow the scope of the non-applicability shield accordingly. This could include, for example, a determination that a specific post-2014 construction activity was not subject to Part 60, Subpart XXX. Alternatively, MDEQ could consider removing the broad based shield and discuss any applicability considerations in the regulatory analysis section of the Staff Report.
2. Section 2, FGICENGINES III.2. Please ensure that the malfunction abatement/preventative maintenance plan for FGICEENGINES is readily accessible in the permit record, including online Internet availability if feasible. As addressed by EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program," information cited or cross-referenced in permits should be current and readily available to the permitting agency and to the public.
3. Section 2, FGICENGINES, III.2. The underlying applicable requirement citations for the malfunction abatement/preventative maintenance plan include authority from the Permit to

Install program. Please review condition III.2. and include the Footnote 2 designation, as appropriate, to identify that the condition is enforceable pursuant to Title I of the Clean Air Act and the state procedures for identifying the Source-wide Permit to Install.

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

Sent: Friday, November 9, 2018 7:58 AM

To: Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>; Ethridge, Christopher (DEQ) <ETHRIDGEC@michigan.gov>; Hare, Chris (DEQ) <HAREC@michigan.gov>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>

Cc: McCann, Gina (DEQ) <McCannG2@michigan.gov>

Subject: N5985 Whitefeather Landfill/EDP - 30 Day Public Comment Notice

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-N5985-20XX, for Republic Services of Michigan IV, LLC - Whitefeather Landfill and Energy Developments Pinconning, LLC (State Registration Number: N5985), located in Pinconning, Bay County, Michigan. The public comment period will begin on November 12, 2018 and will end on December 12, 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:

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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 Gina McCann (mccanng2@michigan.gov), Senior Environmental Quality Analyst, DEQ, Saginaw Bay District Office. Please copy Chris Hare (harec@michigan.gov), Saginaw Bay District Supervisor, DEQ, Chris Ethridge (ethridgec@michigan.gov), Field Operations Manager, DEQ, and Kelly Orent, (orentk@michigan.gov), DEQ.

Andrea Irwin

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