

**From:** Valenziano, Beth  
**To:** [McCann, Gina \(DEQ\)](#); [Hare, Chris \(DEQ\)](#); [Ethridge, Christopher \(DEQ\)](#); [Orent, Kelly \(DEQ\)](#)  
**Cc:** [Blathras, Constantine](#); [Damico, Genevieve](#)  
**Subject:** EPA comments regarding City of Midland Utilities Division (N6004) 30-Day Public Comment Period (ROP)  
**Date:** Monday, November 5, 2018 11:12:20 AM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image001.png](#)

---

Below are EPA's comments regarding the draft ROP for City of Midland Utilities (SRN N6004). If you have any questions or would like to discuss further, please let me know.

Thanks,

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 City of Midland Utilities (State Registration Number N6004), 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. Staff Report, Regulatory Analysis. Please clarify and correct the source's major source status with respect to aggregate and individual hazardous air pollutants (HAPs). The third paragraph states that the source is major for both aggregate and individual HAPs, the seventh paragraph generally states that HAPs are below the major source thresholds, and the twelfth paragraph states that formaldehyde emissions are major.
2. Staff Report, Source-Wide Permit to Install and Appendix 6, Permits to Install. Together, the Permit to Install table in the Staff Report and Appendix 6 of the Renewable Operating Permit address the source's construction permit history and document the Permit to Install underlying applicable requirement origin and authority, as required by 40 CFR §70.6(a)(1)(i). It appears that some permit to install actions are not included, even though they were documented in the previous Renewable Operating Permit. Please review the source's permitting record and identify the Permits to Install in the Staff Report or Appendix 6, in accordance with MDEQ's Renewable Operating Permit Manual.
3. EU-FURNACE. This section of the permit includes conditions established pursuant to Permit to Install # 179-17. Please review all conditions in EU-FURNACE and include the Footnote 1 and Footnote 2 designations, as appropriate, to each condition that is enforceable pursuant to Title I of the Clean Air Act, Michigan Rules 201(1)(a) or (b), and the state procedures for identifying the Source-wide Permit to Install.

4. EU-FURNACE. In accordance with the monitoring requirements in 40 CFR §70.6(a)(3) and (c)(1), please either 1) supplement the monitoring and recordkeeping (including data collection frequency, data averaging, and calculations) in the permit to assure compliance with the 0.17 pound per hour SO<sub>2</sub> limit or 2) provide justification in the Staff Report verifying that the existing monitoring in VI.2 is sufficient to assure compliance with the hourly SO<sub>2</sub> limit.

5. EU-FURNACE. Section VI. includes a requirement for noncertified visible emissions readings. Typically, noncertified readings are only used to detect the presence or absence of visible emissions, and they typically require subsequent certified readings and/or corrective action for units that do not normally have any detectible visible emissions. In contrast, EU-FURNACE is a used oil furnace subject to a six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity. In accordance with 40 CFR §70.6(a)(3) and (c)(1), please either 1) supplement the monitoring and recordkeeping in the permit as necessary to assure compliance with the opacity limits, or 2) provide justification in the Staff Report verifying how the existing permit conditions are sufficient to assure compliance.

6. EU-FURNACE. Please correct each of the four references to Appendix A in EU-FURNACE to Appendix 3, pertaining to used oil compliance monitoring.

7. FGICENGINES. This section of the permit includes conditions established pursuant to Permits to Install #45-10, #45-10A, and #45-10B. Please review all conditions in FGICENGINES and include the Footnote 1 and Footnote 2 designations, as appropriate, to each condition that is enforceable pursuant to Title I of the Clean Air Act, Michigan Rules 201(1)(a) or (b), and the state procedures for identifying the Source-wide Permit to Install.

8. FGICENGINES. Section III.2. is missing the identification of the underlying applicable requirement(s). In accordance with 40 CFR §70.6(a)(1)(i), please add the underlying origin and authority for these permit conditions.

9. Plans referenced in the permit. Several conditions in the permit refer to requirements to develop and operate in accordance with specific plans. Please ensure that these plans are 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. The referenced plans include: surface monitoring design plan (EU-LANDFILL), startup, shutdown, malfunction plans (EU-ACTIVECOLL, EU-OPENFLARE), preventative maintenance plan (EU-TREATMENTSYS), and malfunction abatement/preventative maintenance plan (FGICENGINES).

---

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

**Sent:** Monday, October 8, 2018 6:22 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:** N6004 City of Midland Utilities Division 30-Day Public Comment Period

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-N6004-20XX, for City of Midland Utilities Division (State Registration Number: N6004), located in Midland, Midland County, Michigan. The public comment period begins on October 8, 2018 and will end on November 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 Gina McCann ([mccann2@michigan.gov](mailto:mccann2@michigan.gov)), Senior Environmental Quality Analyst, DEQ, Saginaw Bay District Office. Please copy Chris Hare ([harec@michigan.gov](mailto:harec@michigan.gov)), Saginaw Bay District Supervisor, DEQ, Chris Ethridge ([ethridgec@michigan.gov](mailto:ethridgec@michigan.gov)), Field Operations Manager, DEQ, and Kelly Orent, ([orentk@michigan.gov](mailto:orentk@michigan.gov)), DEQ.

*Andrea Irwin*

MDEQ – Air Quality Division  
Saginaw Bay District Office

☎ 989-894-6210 🖨 989-891-9213

✉ [irwina1@michigan.gov](mailto:irwina1@michigan.gov)