

**From:** Valenziano, Beth  
**To:** [Scanlan, Joseph \(DEQ\)](#); [Lancaster, Edward \(DEQ\)](#); [Ethrige, Christopher \(DEQ\)](#); [Orent, Kelly \(DEQ\)](#)  
**Cc:** [Damico, Genevieve](#); [Blathras, Constantine](#)  
**Subject:** EPA comments on draft initial ROP for Wood Island Waste Management, Inc. (SRN N6034)  
**Date:** Thursday, May 31, 2018 5:51:33 PM  
**Attachments:** [image003.png](#)

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Hello Joe and Ed,

Here are EPA's comments on Wood Island Waste Management's draft initial Title V permit. Please let me know if you have any questions or would like to discuss further.

Thanks,  
Beth Valenziano  
Air and Radiation Division  
Air Permits Section  
(312) 886-2703



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The U.S. Environmental Protection Agency has reviewed the draft initial Renewable Operating Permit (ROP) for Wood Island Waste Management, Inc. (State Registration Number: N6034), located in Wetmore, 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. Because this source has not received any Permits to Install (PTIs), the draft initial ROP correspondingly does not include a source-wide PTI (see Michigan Rule 214a). However, the draft ROP includes several references to a source-wide PTI. Please review the following and revise the permit and Staff Report as necessary to clarify that the ROP does not include a source-wide PTI:
  - PTI identification number on the header of each page
  - PTI general conditions on page 10
  - Rule 201 footnote references on pages 10, 16, 20, and 27
  - Standard source-wide PTI language on page 8 of the Staff Report
2. Please verify whether this source is subject to 40 CFR Part 63, Subpart AAAAA, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste Landfills, and include the applicable NESHAP requirements in the permit as necessary.
3. The emission table for EU-WOOD BOILER includes requirements pursuant to 40 CFR Part 63, Subpart JJJJJ, NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources, for

both biennial tune-ups and 5-year tune-ups. To clarify that the seasonal boiler is subject to the 5-year requirements, please review Section III.5 and Section III.6 and consider including only the 5-year tune-up provisions. For example, one approach could be to 1) delete Section III.5 and 2) include the specific applicable provisions of 40 CFR 63.11223(b)(1) through (7) under Section III.6 of the permit.

4. Section E, Non-Applicable Requirements, includes a table that generally refers to the Flexible Group representing the general landfill. In order to meet the requirements of 40 CFR 70.6(f) (1)(ii), a non-applicability permit shield should specify the non-applicable requirements and also include a determination regarding why the requirements are not applicable. Please provide additional documentation as necessary in Section E. for any non-applicability permit shield determinations.

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**From:** Ruokolainen, Nadine (DEQ) [<mailto:RuokolainenN@michigan.gov>]

**Sent:** Friday, May 4, 2018 8:30 AM

**To:** Valenziano, Beth <[valenziano.beth@epa.gov](mailto:valenziano.beth@epa.gov)>; Blathras, Constantine <[blathras.constantine@epa.gov](mailto:blathras.constantine@epa.gov)>; Damico, Genevieve <[damico.genevieve@epa.gov](mailto:damico.genevieve@epa.gov)>; Diaz, Stephanie <[diaz.stephanie@epa.gov](mailto:diaz.stephanie@epa.gov)>; Ethridge, Christopher (DEQ) <[ETHRIDGEC@michigan.gov](mailto:ETHRIDGEC@michigan.gov)>; Orent, Kelly (DEQ) <[ORENTK@michigan.gov](mailto:ORENTK@michigan.gov)>

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**Subject:** 30-Day Public Comment Period ROP N6034

A 30-day public comment period will be initiated for a draft initial Renewable Operating Permit (ROP) number MI-ROP-N6034-20XX, for Wood Island Waste Management, Inc. (State Registration Number: N6034), located in Wetmore, Alger County, Michigan. The public comment period begins on May 7, 2018 and will end on June 6, 2018.

The Public Notice, Initial 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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[https://www.michigan.gov/deq/0,4561,7-135-3310\\_70487\\_6975-389493--,00.html](https://www.michigan.gov/deq/0,4561,7-135-3310_70487_6975-389493--,00.html)

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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 Joseph Scanlan ([scanlanj@michigan.gov](mailto:scanlanj@michigan.gov)), Environmental Quality Analyst, DEQ, Upper Peninsula District Office. Please copy Ed Lancaster ([lancastere1@michigan.gov](mailto:lancastere1@michigan.gov)), Upper Peninsula 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.

Thank you.

*Nadine Ruokolainen*, Secretary  
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