

From: Valenziano, Beth
To: [Ahammod, Shamim \(DEQ\)](#); [Lancaster, Edward \(DEQ\)](#); [Ethridge, Christopher \(DEQ\)](#); [Orent, Kelly \(DEQ\)](#)
Cc: [Blathras, Constantine](#); [Damico, Genevieve](#)
Subject: EPA comments on draft ROP renewal for White Pine Electric Power (ROP B1966)
Date: Wednesday, May 23, 2018 12:01:37 PM
Attachments: [image002.png](#)

Hello,

Here are EPA's comments on White Pine Electric Power's draft Title V permit. Please let me know you have any questions or would like to discuss further.

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



The U.S. Environmental Protection Agency has reviewed the draft renewal of the Renewable Operating Permit (ROP) for White Pine Electric Power LLC (State Registration Number: B1966), located in White Pine, 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. Please consider describing the functions of the following boilers at the facility in the Staff Report: EU-PP03, EU-PP04, and EU-PP07. For example, are these industrial boilers for heat or steam production? Do they serve generators for electrical production? Do they supply electricity to the grid? Providing this information would help inform what applicable requirements these boilers may be subject to, in accordance with 40 CFR 70.6(a)(1).
2. EU-PP07 Emission Table, Section III.1. This provision incorrectly references a different emission unit. Please correct the reference in this permit condition from EU-PP03 to EU-PP07.

In addition, the EU-PP07 Emission Table does not include associated monitoring requirements to assure compliance with the fuel requirement in Section III.1. Please review this permit condition and include any monitoring necessary to assure compliance, in accordance with 40 CFR §70.6(a)(3) and (c)(1).

3. FG-PP05 & 06 Emission Table. The following conditions in the draft ROP originated from PTI No. 142-14, but the draft ROP does not identify them with Footnote 2, which designates the

conditions as being part of the source-wide PTI: Section III.2.; Section IV.1.; Section V.1.; Sections VI.1 through 3; Section VII.4.; and Sections IX. 1. through 5. Please add the Footnote 2 designations as appropriate.

4. FG-PP05 & 06 Emission Table. Section V.1. states (in part): “No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office.” In comparison, PTI No. 142-14 requires the test plan to be submitted 60 days prior to testing. Please verify the underlying applicable requirement for test plan notification and correct the draft ROP if necessary.
5. Section E. Non-Applicable Requirements. This section of the permit includes four broad non-applicability permit shield justifications that generally cover five boilers at the facility. In order to meet the requirements of 40 CFR 70.6(f)(1)(ii), a non-applicability permit shield should include a determination regarding why the requirements are not applicable. As currently written, the determinations do not provide a specific analysis why each of these units are not subject to each of the listed standards and requirements. Please provide additional documentation as necessary to ensure that all Section E. non-applicability permit shield determinations include standard-specific and unit-specific justifications.

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

Sent: Friday, April 20, 2018 12:15 PM

To: Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>; Diaz, Stephanie <diaz.stephanie@epa.gov>; Ethridge, Christopher (DEQ) <ETHRIDGEC@michigan.gov>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>; natalene.cummings@fcpotawatomi-nsn.gov; kristin.hart@wisconsin.gov; Richard.Wulk@Wisconsin.gov; Imelda.Hofmeister@wisconsin.gov

Cc: Lancaster, Edward (DEQ) <LANCASTERE1@michigan.gov>; Ahammod, Shamim (DEQ) <AhammodS@michigan.gov>

Subject: 30 day public comment period - ROP B1966

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B1966-20XX, for WHITE PINE ELECTRIC POWER, LLC (State Registration Number: B1966), located in White Pine, Ontonagon County, Michigan. The public comment period begins on April 23, 2018 and will end on May 23, 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 Shamim Ahammod (ahammodS@michigan.gov), Environmental Engineer, DEQ, Upper Peninsula District Office. Please copy Ed Lancaster (lancastere1@michigan.gov), Upper Peninsula District Supervisor, DEQ, Chris

Ethridgec (ethridgec@michigan.gov), Field Operations Manager, DEQ, and Kelly Orent, (orentk@michigan.gov), DEQ.

Thank you.

Nadine Ruokolainen, Secretary
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