

From: [Valenziano, Beth](#)
To: [Sheehan, Meg \(EGLE\)](#); [Hare, Chris \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#); [Karl, Matthew \(EGLE\)](#)
Cc: [Damico, Genevieve](#); [Blathras, Constantine](#)
Subject: EPA comments RE: B2875 Michigan Sugar Company - Caro Factory 30 Day Public Notice
Date: Monday, May 20, 2019 2:52:32 PM
Attachments: [image001.png](#)

Below are EPA's comments regarding the draft ROP renewal for Michigan Sugar Company, Caro Factory (SRN B2875). 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
(312) 886-2703



The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for Michigan Sugar, Caro Factory, State Registration Number B2875, located in Caro, 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. Conditions VI.1. for both EUPACKAGEBOILER3 and FG2KILNS include non-certified visible emissions monitoring and a follow up Method 9 visible emissions test if "abnormal visible emissions" are observed. Pursuant to 40 CFR §§70.6(a)(3) and (c)(1), please clarify the term "abnormal visible emissions", and/or further clarify when a Method 9 observation is required, and/or include additional conditions as appropriate (such as when FG2KILNS is venting to the atmosphere) to assure that the permit includes monitoring sufficient to determine compliance with the associated opacity and particulate matter limits.
2. For EUBOILER4, Condition I.3, please verify the averaging time required by the underlying applicable requirements for the lb/MMBTU carbon monoxide limit. As drafted, the permit includes a long term, 30 day block average and a short term hourly average of test runs during performance testing. If necessary, revise the permit to assure that the permit includes all applicable requirements and monitoring sufficient to assure compliance (which could also include work practice requirements), in accordance with 40 CFR §§70.6(a)(1), (a)(3), and (c)(1).
3. FG635DEXGAS1BOILER includes conditions required by the Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR Part 63, Subpart DDDDD. To ensure consistency, clarity, and to assure that the permit includes all applicable requirements (including updated electronic submittal provisions) pursuant to 40 CFR 70.6(a)(1), please

consider updating this section of the permit in accordance with the most recent Michigan EGLE's MACT permit condition templates.

From: Irwin, Andrea (DEQ) <IrwinA1@michigan.gov>
Sent: Monday, April 22, 2019 6:33 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>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>; Sheehan, Meg (DEQ) <SheehanM@michigan.gov>
Cc: Hare, Chris (DEQ) <HAREC@michigan.gov>
Subject: B2875 Michigan Sugar Company - Caro Factory 30 Day Public Notice

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B2875-20XX, for Michigan Sugar Company - Caro Factory (State Registration Number: B2875), located in Caro, Tuscola County, Michigan. The public comment period begins on April 22, 2019 and will end on May 22, 2019.

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 Meg Sheehan (sheehanm@michigan.gov), 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

MDEQ – Air Quality Division
Saginaw Bay District Office
Ph: 989-894-6210 Fax: 989-891-9213
irwina1@michigan.gov