
From: Valenziano, Beth <valenziano.beth@epa.gov>
Sent: Thursday, May 11, 2017 2:15 PM
To: Owens, Caryn (DEQ); Lancaster, Edward (DEQ); Hollenbach, Heidi (DEQ); Ethridge, Christopher (DEQ)
Cc: Blathras, Constantine; Diaz, Stephanie; Damico, Genevieve
Subject: EPA comments regarding Wisconsin Electric Power Company - Presque Isle Power Plant (State Registration Number B4261), Marquette, Marquette County, Michigan

Follow Up Flag: Follow up
Flag Status: Completed

Hello Caryn, Ed, Heidi, and Chris,

Here are our comments on WE Energies proposed minor ROP modification. If you have any questions, please let me know and we can discuss further.

Thank you!

Beth Valenziano
Air Permits Section
Air and Radiation Division
USEPA Region 5
312-886-2703

The U.S. Environmental Protection Agency has reviewed the proposed Renewable Operating Permit modification for WE Energies Presque Isle Power Plant, State Registration Number B4261, located in Marquette, 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. In order to clearly identify all conditions of the source-wide permit to install that are included within the title V permit, please also include "footnote 2" designations for all permit conditions that originated from the federal consent decree and were made permanent pursuant to their inclusion in the permit to install. See Michigan Rule 214a(3).
2. EUBOILER7 footnote designations 2, 3, 4 are missing for the PM limit of 0.030 lb/MMBTU. Please add the footnotes.
3. Please revise the title of Appendix 1-B, "Definitions Pursuant to the Consent Decree, U.S. and MDEQ v Wisconsin Electric Power Company, Enforced through ACT 451 324.5503(b)" to make it clear that 1) the definitions apply to specific permit conditions (Footnote 3 and Footnote 4 designations and certain other appendices), 2) the underlying applicable requirement (UAR) for the definitions is pursuant to Act 451 324.5503(b), not the terminated Consent Decree, and 3) the definitions are part of the source-wide permit to install (i.e., footnote 2 designation).

Example language

Appendix 1-B, Definitions Applicable to Specified Permit Conditions. The following definitions apply to permit conditions originally established in the consent decree settling, "U.S. and MDEQ v Wisconsin Electric Power Company, Civil Action No. 03-C-0371." ² **(Act 451 324.5503(b))**

4. In Appendix 3, Monitoring Requirements, please add the Act 451 324.5503(b) UAR as well as the information included in footnotes 2, 3, and 4 to the requirements that originated from the Consent Decree. This will help ensure the permanency of the Consent Decree provisions as established in PTI 3-15A, identify the provisions in the appendix that are part of the source-wide permit to install, and clarify that the definitions in Appendix 1-B apply to these requirements.
5. In Appendix 9-B, Allowance Provisions, please add the Act 451 324.5503(b) UAR as well as the information included in footnotes 2, 3, and 4 to the requirements that originated from the Consent Decree. This will help ensure the permanency of the Consent Decree provisions as established in PTI 3-15A, identify the provisions in the appendix that are part of the source-wide permit to install, and clarify that the definitions in Appendix 1-B apply to these requirements.

From: Owens, Caryn (DEQ) [mailto:OwensC1@michigan.gov]

Sent: Monday, March 27, 2017 1:23 PM

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

Cc: Lancaster, Edward (DEQ) <LANCASTERE1@michigan.gov>; Ransom, Janis (DEQ) <RansomJ1@michigan.gov>; Stueckmullane, Liz <Liz.Stueckmullane@we-energies.com>; Brandt, Cynthia H <CHBrandt@integrysgroup.com>

Subject: Wisconsin Electric Power Company - Presque Isle Power Plant (State Registration Number B4261), Marquette, Marquette County, Michigan

This note is to initiate the United States Environmental Protection Agency (USEPA) 45-day review period for a proposed Minor Modification to Renewable Operating Permit (ROP) Number MI-ROP-B4261-2013b for Wisconsin Electric Power Company - Presque Isle Power Plant (State Registration Number B4261), located in Marquette, Marquette County, Michigan. The application is to incorporate a Permit to Install into the ROP.

The ROP revision application, Proposed ROP, and the Staff Report are available through the Internet. The documents are located at the following address:

http://www.deq.state.mi.us/aps/downloads/rop/pub_ntce/pub_ntce.shtml

Any comments that arise during the 45-day review period can be e-mailed to Caryn Owens (owensc1@michigan.gov), Environmental Quality Analyst, DEQ. Please copy Janis Ransom (ransomj1@michigan.gov), Upper Peninsula District Supervisor, DEQ and Chris Ethridge (Ethridgec@michigan.gov), Field Operations Supervisor, DEQ.

Thank you.

Caryn Owens
Environmental Quality Analyst
MDEQ-Air Quality Division
120 Chapin Street
Cadillac, Michigan 49601
231-876-4414
owensC1@michigan.gov