

---

**From:** Valenziano, Beth <valenziano.beth@epa.gov>  
**Sent:** Wednesday, May 24, 2017 1:58 PM  
**To:** Owens, Caryn (DEQ); Nixon, Shane (DEQ); Ethridge, Christopher (DEQ); Hollenbach, Heidi (DEQ)  
**Cc:** Damico, Genevieve; Diaz, Stephanie; Blathras, Constantine  
**Subject:** EPA comments re: proposed TES Filer City Station ROP modification (State Registration Number N1685), Filer City, Manistee County, Michigan

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello Caryn, Shane, Heidi, and Chris,

Here are our comments on TES Filer City's 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 TES Filer City Station, State Registration Number N1685, located in Filer City, 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. Source wide conditions. In order to clearly identify the origin and authority and permanency of the permit to install conditions that originated from the federal Administrative Consent Order, please include the following information in the permit for conditions IX.1. and IX.2. In other permitting actions, MDEQ included this information by creating a footnote 3.  
"This condition is federally enforceable and was originally established in the TES Filer City Station Agreed Administrative Consent Order and Information Request Effective November 23, 2015 and also pursuant to Act 451 324.5503(b), and will remain in effect after termination of the administrative consent order."
2. FGBOILERS. The design/equipment parameters in section IV.6 through IV.10 do not include a footnote 2 designation. Please verify whether these are Title I conditions pursuant to Rule 201(1)(a) and include footnote 2 as appropriate. See Michigan Rule 214a(3).
3. Appendix 3. In order to clearly identify the origin and authority and permanency of the permit to install conditions that originated from the federal Administrative Consent Order, please include the following information in the permit for all conditions in Appendix 3:

“This condition is federally enforceable and was originally established in the TES Filer City Station Agreed Administrative Consent Order and Information Request Effective November 23, 2015 and also pursuant to Act 451 324.5503(b), and will remain in effect after termination of the administrative consent order.”

4. Appendix 3. 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” (or equivalent) designations for all permit conditions in Appendix 3 that are also Title I conditions pursuant to Rule 201(1)(a). See Michigan Rule 214a(3).
5. Appendix 3, conditions 5 and 7 of Permit to Install 110-14B, pertaining to continuous opacity monitoring system span value and excess emission reporting requirements, do not appear to be included in the proposed ROP. Please revise the permit as necessary to include the applicable Title 1 and New Source Performance Standard requirements from the Permit to Install.

---

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

**Sent:** Monday, April 10, 2017 3:36 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:** Nixon, Shane (DEQ) <NIXONS@michigan.gov>; Jason M. Prentice <JASON.PRENTICE@cmsenergy.com>; Todd A. Guenthardt (TODD.GUENTHARDT@cmsenergy.com) <TODD.GUENTHARDT@cmsenergy.com>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>

**Subject:** TES Filer City Station (State Registration Number N1685), Filer City, Manistee 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-N1685-2015a for TES Filer City Station (State Registration Number N1685), located in Filer City, Manistee County, Michigan. The application is to incorporate a Permit to Install into the ROP and make other minor changes to 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](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](mailto:owensC1@michigan.gov)), Environmental Quality Analyst, DEQ. Please copy Shane Nixon ([nixons@michigan.gov](mailto:nixons@michigan.gov)), Cadillac District 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](mailto:owensC1@michigan.gov)