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**From:** Diaz, Stephanie [mailto:diaz.stephanie@epa.gov]

**Sent:** Wednesday, August 9, 2017 4:57 PM

**To:** Weis, Stephen (DEQ); Hude, Nathaniel (DEQ); McLemore, Wilhemina (DEQ); Ethridge, Christopher (DEQ)

**Cc:** Blathras, Constantine; Valenziano, Beth; Damico, Genevieve

**Subject:** USEPA comments RE: 30-day Public Comment Period: Wyandotte Municipal Services - B2132

Hello everyone,

Here are our comments on Wyandotte Municipal Services draft ROP renewal. If you have any questions, please let me know, and we can discuss further.

Thanks!

Stephanie Diaz  
EPA Region 5  
Air Permit Section  
312-353-1907

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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP) for Wyandotte Municipal Services, State Registration Number B2132, located in Wyandotte, 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, page 6: The Staff Report states that EUUNIT7BLR is exempt from CAM requirements for SO<sub>2</sub>. However, the permit does not list an SO<sub>2</sub> emission limit for EUUNIT7BLR. Please clarify the CAM applicability for EUUNIT7BLR with regards to SO<sub>2</sub> and include any additional applicable requirements in the permit, as appropriate.
2. Page 21: EUUNIT7BLR SC I.1., a NO<sub>x</sub> limit, lists SC VI.1. as the monitoring/testing method. SC VI.1. lists only the consent decree as its underlying requirement, meaning that the condition will become null and void upon the effective date of termination of the consent decree according to SC IX.1 of Source-Wide Conditions. Please list appropriate monitoring and recordkeeping that is permanent so as to ensure compliance with the emission limit in accordance with 40 C.F.R. 70.6(a)(3) and (c)(1).
3. Page 21: EUUNIT7BLR S.C. II.1. requires that only natural gas be burnt for this emission unit. Based on the Staff Report, this condition originated in PTI 2-16. Please verify whether this is a Title I condition pursuant to Rule 201(1)(a) and include footnote 2 as appropriate. See Michigan Rule 214a(3).
4. Page 25, FGWMENGINES: SC I.2. lists a test protocol as the time period/operating scenario. Based on our ongoing discussions with MDEQ, we understand that MDEQ will be incorporating the appropriate test period averaging times in permits. We recommend that this condition be updated to reflect an appropriate averaging time.
5. Page 26, FGWMENGINES: SC VI.3. required the facility to keep calculation records for NO<sub>x</sub> emissions, which is relevant for compliance with the NO<sub>x</sub> emission limit in SC I.1. However, the permit does not specify the calculation methods. Please include emission calculation requirements in the permit and/or provide further explanation in the Staff Report as appropriate to ensure that the permit includes monitoring and recordkeeping,

including calculations, sufficient to assure compliance with the emission limits, in accordance with 40 C.F.R. 70.6(c)(1).

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**From:** Myott, Brad (DEQ) [<mailto:MYOTTB@michigan.gov>]

**Sent:** Friday, July 7, 2017 1:53 PM

**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)>

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**Subject:** 30-day Public Comment Period: Wyandotte Municipal Services - B2132

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B2132-20XX, for Wyandotte Municipal Services (State Registration Number: B2132), located in Wyandotte, Wayne County, Michigan. The public comment period begins on July 10, 2017, and will end on August 9, 2017.

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 Stephen Weis ([weiss@michigan.gov](mailto:weiss@michigan.gov)), Senior Environmental Engineer, DEQ, Detroit District Office. Please copy Wilhemina McLemore ([mclemorew@michigan.gov](mailto:mclemorew@michigan.gov)), Detroit District Supervisor, DEQ and Chris Ethridge ([ethridgec@michigan.gov](mailto:ethridgec@michigan.gov)), Field Operations Manager, DEQ.

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