

From: [Ethridge, Christopher \(EGLE\)](#)
To: [Orent, Kelly \(EGLE\)](#)
Subject: FW: EPA comments re: 30 Day Public Comment Period - Viking Energy of Lincoln ROP Renewal (N0890)
Date: Wednesday, December 11, 2019 8:17:48 AM
Attachments: [image001.png](#)

FYI

From: Blathras, Constantine <blathras.constantine@epa.gov>
Sent: Monday, December 09, 2019 10:10 AM
To: Nixon, Shane (EGLE) <NIXONS@michigan.gov>; Rogers, William (EGLE) <ROGERSW@michigan.gov>; Ethridge, Christopher (EGLE) <ETHRIDGEC@michigan.gov>
Cc: Valenziano, Beth <valenziano.beth@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>
Subject: EPA comments re: 30 Day Public Comment Period - Viking Energy of Lincoln ROP Renewal (N0890)

Hello,

Below are EPA's comments on the draft renewal ROP for Viking Energy of Lincoln. If you have any questions or would like to further discuss, please let me know.

Thanks.
Dino Blathras
EPA Region 5



The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for Viking Energy of Lincoln (State Registration Number: N0890), located in Lincoln, 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. On page 20 of the draft permit, condition II. Material limits, has 24-hour time period tons burned limits for particle board and plywood, creosote treated wood, pentachlorophenol treated wood, and tire derived fuel into the boiler. As discussed during a conference call with Michigan on Wednesday, December 4, 2019, it is not clear from the draft permit nor the permit application how the facility will assure daily compliance with these permit condition limits. Whereas the 12-month rolling time period ton per year limits and compliance demonstration found on page 12 are sufficiently described in the fuel procurement and handling plan, the compliance demonstration for the daily limits are not clearly provided. Please describe how the facility will meet the daily material limits and assure daily compliance

in a practically enforceable manner.

2. As discussed during our call, the draft permit references multiple off permit plans: malfunction abatement plan, fugitive emissions control plan, fuel procurement and handling plan, and compliance assurance monitoring plan. During the comment period, the applicable plans are available to the public as part of the permit application. EPA recommends, and we are glad to hear, that Michigan will make the plans available electronically to the public once the draft permit is finalized as part of the final permit record. As addressed by EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program," information cited or cross-referenced in permits should be current and readily available to the permitting agency and to the public.