

From: [Valenziano, Beth](#)
To: [DeVries, Kaitlyn \(EGLE\)](#); [Hollenbach, Heidi \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#)
Cc: [Damico, Genevieve](#); [Blathras, Constantine](#)
Subject: EPA comments re: 30 Day Public Comment Period - Ada Cogen ROP Renewal (N1784)
Date: Monday, December 2, 2019 4:08:29 PM
Attachments: [image001.png](#)

Hello Kaitlyn, Heidi, Kelly, and Chris,

Below are EPA's comments regarding the draft renewal ROP for Ada Cogeneration Limited Partnership. If you have any questions or would like to discuss further, please let me know.

Thank you!

Beth Valenziano
Air and Radiation Division
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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for Ada Cogeneration Limited Partnership (State Registration Number: N1784), located in Ada, 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. EUTURBINE SC I.1. The Monitoring/Testing Method references for the NOx limit may be missing additional references to SC V.3, SC VI.3, AND SC VI.5. Please review these conditions and include them in the NOx Monitoring/Testing Method column as appropriate to clearly identify all compliance monitoring requirements associated with this limit, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
2. EUTURBINE SC I.2. The Monitoring/Testing Method references for the CO limit may be missing additional references to SC VI.4. and SC VI.5. Please review these conditions and include them in the CO Monitoring/Testing Method column as appropriate to clearly identify all compliance monitoring requirements associated with this limit, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
3. EUTURBINE SC II.1. Please review the regulatory authority for the natural gas material limit, verify the streamlining analysis/subsumed SO2 requirements, and revise the permit as necessary to assure that the permit includes all applicable requirements and associated monitoring in accordance with 40 CFR 70.6(a)(1), (a)(3), and (c)(1).
4. EUTURBINE SC VI.3. This condition requires a parameter monitoring plan to be kept on-site

which explains the procedures used to document proper operation of the Nox controls. Please ensure that the monitoring plan is readily accessible in the permit record, including online Internet availability if feasible. 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.

5. EUTURBINE SC VI.1. and 2. The underlying applicable requirements (UAR) cited for these monitoring/recordkeeping requirements list only NSPS subpart GG. However, this monitoring is also associated with the Nox BACT limit in SC I.1. Were SC VI.1. and 2. included in the originating Permit to Install? If yes, should these conditions also include a UAR of 40 CFR 52.21(j) as well as a footnote 2 authority designation? If no, should these conditions also include a UAR of R 336.1213(3)? Please review the UARs and revise the permit as necessary.
6. FGENERGY SC I.1. and 2. The Monitoring/Testing Method references for the NOx limits may be missing additional references to SC V.3. Please review SC V.3. and include it in the NOx Monitoring/Testing Method column as appropriate to clearly identify all compliance monitoring requirements associated with these limits, in accordance with 40 CFR 70.6(a)(3) and (c)(1).
7. FGCAM SC V. and VI. EUTURBINE, FGENERGY, and the Staff Report indicate that there are 2 water/fuel injection ratios- one for EUTURBINE alone, and one for FGENERGY (i.e., EUTURBINE and EUDUCTBURNER when operating together). To ensure that the permit includes clear, enforceable conditions meeting 40 CFR 70.6(a)(1) and 64.6(c), please revise FGCAM SC V. and VI. as necessary to clarify that there are 2 water-to-fuel CAM indicators.

From: Hollenbach, Heidi (EGLE) <HOLLENBACHH@michigan.gov>

Sent: Monday, November 4, 2019 6:36 AM

To: Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>

Cc: DeVries, Kaitlyn (EGLE) <DeVriesK1@michigan.gov>; Ethridge, Christopher (EGLE) <ETHRIDGEC@michigan.gov>; Orent, Kelly (EGLE) <ORENTK@michigan.gov>

Subject: 30 Day Public Comment Period - Ada Cogen ROP Renewal (N1784)

A 30-day public comment period has been initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-N1784-20XX, for Ada Cogeneration Limited Partnership (State Registration Number: N1784), located in Ada, Kent County, Michigan. The public comment period begins on November 4, 2019 and will end on December 4, 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:

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<http://www.michigan.gov/egle/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 Kaitlyn DeVries (devriesk1@michigan.gov), Environmental Quality Analyst, EGLE, Grand Rapids District Office. Please copy Heidi Hollenbach (hollenbachh@michigan.gov), Grand Rapids District Supervisor, EGLE, Chris Ethridge (ethridgec@michigan.gov), Field Operations Manager, EGLE, and Kelly Orent, (orentk@michigan.gov), EGLE.

Thanks,
Heidi

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