



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 16 2015

REPLY TO THE ATTENTION OF:

Scott Miller
Jackson District Supervisor
Jackson District Office
Michigan Department of Environmental Quality
Air Quality Division
301 East Louis Glick Highway
Jackson, Michigan 49201-1556

Dear Mr. Miller:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP), permit number MI-ROP-B6611-20XX, for Michigan South Central Power Agency – Endicott Generating Station located in Litchfield, 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) The Michigan South Central Power Agency – Endicott Generating Station is subject to a 2015 Administrative Consent Order (ACO). The ACO is currently not cited in the Draft Permit or the Staff Report. Please revise the Draft Permit to include the applicable requirements, including paragraphs 15, 16, 17, and 18 of the ACO, per R336.1101 (o)(iv). Please review the requirements in the ACO and update the Draft Permit accordingly. In addition, please update the Staff Report.
- 2) Staff Report. The ROP for the proposed minor modification issued for the facility in 2014 presents additional emission units (EU-ENGINE6, EU-ENGINE7, and EU-TANK) that are not presented in the Draft Permit. Please verify the status of these emissions units and include a discussion in the Staff Report.
- 3) Staff Report. The Regulatory Analysis section of the Staff Report indicates the facility is exempt from compliance assurance monitoring (CAM) regulation for nitrogen oxides and sulfur dioxide. Please clarify the CAM applicability and exemption analysis, in accordance with 40 C.F.R. § 64.2.
- 4) EU-UNIT-1, SC. I Various Emission Limits. The monitoring/testing method for various pollutants for EU-UNIT-1 do not appear to reference the correct special condition. Please review the list below to ensure that the Draft Permit includes monitoring sufficient

to ensure compliance, and revise the special conditions references, as appropriate, per 40 Code of Federal Regulations (C.F.R.) § 70.6(a)(3)(A), 40 C.F.R. § 70.6(a)(3)(B), and 40 C.F.R. § 70.6(c)(1).

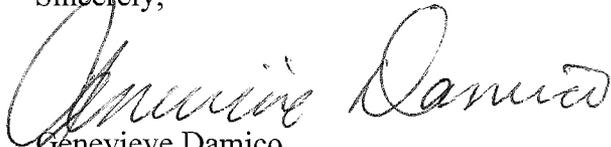
- a. EU-UNIT-1, SC. I.6 Particulate Matter (PM). The monitoring testing method references SC. V.1 which discusses testing required under 40 C.F.R. Part 63, Subpart UUUUU. Please review this reference and revise, as appropriate.
 - b. EU-UNIT-1, SC. I.7 PM. The monitoring testing method references SC. VI.14 which presents maintaining records under the Boiler 1 compliance and assurance monitoring (CAM) plan. Please review this reference and revise, as appropriate.
 - c. EU-UNIT-1, SC. I.8 PM. The monitoring testing method references SC. VI.15 which presents the required monitoring per the CAM plan. Please review this reference and revise, as appropriate.
 - d. EU-UNIT-1, SC. I.9 PM10. The monitoring testing method references SC. VI.14 which presents maintaining records under the Boiler 1 CAM plan. Please review this reference and revise, as appropriate.
 - e. EU-UNIT-1, SC. I.10 PM10. The monitoring testing method references SC. VI.14 which presents maintaining records under the Boiler 1 CAM plan. Please review this reference and revise, as appropriate.
 - f. EU-UNIT-1, SC. I.11 Filterable PM. The monitoring testing method references SC. VI.2 which presents opacity monitoring under the Boiler 1 CAM plan. Please review this reference and revise, as appropriate.
- 5) EU-UNIT-1, SC. IX.4 Other Requirements. The Draft Permit indicates that the permittee shall not operate EU-UNIT-1 unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. Please verify the facility has a plan and it is publicly available. *See* EPA White Paper Number 2 for Improved Implementation of Part 70 Operating Permits Programs, March 5, 1996.
 - 6) EU-TDFF, SC. III.4 Process/Operational Restrictions. The Draft Permit indicates that the permittee shall not operate EU-TDFF unless a malfunction abatement plan (MAP) is implemented and maintained. Please verify that the MAP for EU-TDFF is publicly available. In addition, please verify whether MAP requirements apply to any other emission units and if so, the Draft Permit should include those MAP requirements. *See* EPA White Paper Number 2 for Improved Implementation of Part 70 Operating Permits Programs, March 5, 1996.
 - 7) EU-TDFF, SC. VI.3 Monitoring/Recordkeeping. This condition specifies that the Permittee shall calculate, in a satisfactory manner, the emissions from each bypass event. The Draft Permit does not specify how the permittee should calculate the emissions. The

conditions should specify the methods to determine compliance. Please review this condition and revise to address how the permittee should determine emissions, in accordance with 40 C.F.R. § 70.6(a)(3)(A), 40 C.F.R. § 70.6(a)(3)(B), and 40 C.F.R. § 70.6(c)(1)

- 8) EU-STARTUP-BLR, SC. IX.1. Other Requirements. Narrative concerning the date of construction and actual startup of EU-STARTUP-BLR is presented in this section. Please review this condition and verify the status of the boiler construction and operation.
- 9) EU-NGEMER-GEN, SC. IX.2 Other Requirements. The Permittee is required to comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ. 40 C.F.R. § 63.6590(c) indicates that an affected source meets the requirements of 40 C.F.R. Part 63, Subpart ZZZZ by complying with 40 C.F.R. Part 63, Subpart JJJJ. Please revise this special condition to include the language provided in 40 C.F.R. § 63.6590(c).

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sarah Rolfes, of my staff, at (312) 886-6551.

Sincerely,


Genevieve Damico
Chief
Air Permits Section