



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

SEP 10 2014

REPLY TO THE ATTENTION OF:

Chris Hare
Saginaw Bay District Supervisor
Michigan Department of Environmental Quality
Saginaw Bay District Office
401 Ketchum Street, Suite B
Bay City, Michigan 48708-5430

Dear Mr. Hare:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (MI-ROP-B2840-20XX), for Consumers Energy Company, Karn Weadock Facility, located in Essexville, Michigan 48732. 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) Renewable Operating Permit (ROP), Staff Report, Page 7: Weadock 7 & 8 boilers – The staff report language states “more recently, it was determined that Weadock boilers EU-WEADOCK7 and EU-WEADOCK8 are subject to Prevention of Significant Deterioration (PSD) based on installation of Low NOx burners on the units which while reducing NOx emissions is believed to have resulted in a significant increase in CO emissions.” Please add to the permit record some background information and explanation of this determination. Also, please add any appropriate consent decree or PSD requirements to the permit as necessary.
- 2) ROP, Staff Report, Page 8: The staff report states “ the stationary source has multiple emission units subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) promulgated in 40 CFR Part 63 which are summarized in the table below. The stationary source’s cold cleaners (EU) are currently not subject to the NESHAP for halogenated solvent cleaning operations, 40 CFR, Part 63, Subpart T.” Please clarify whether the cold cleaners referenced here are FG-PARTSCLEANERS12. In addition, provide more explanation of why the cold cleaners are not subject to the NESHAP.
- 3) ROP, Page 43, EU-SORBENT, 1. EMISSION LIMIT(S) for particulate matter (PM), PM₁₀, PM_{2.5} Emission limits/Monitoring Testing Method – The permit states that for the emission limits for PM, PM₁₀ and PM_{2.5} the monitoring is “Per Test Protocol.” Please

explain how this provides sufficient monitoring for the emissions limits for these pollutants and include additional monitoring as necessary.

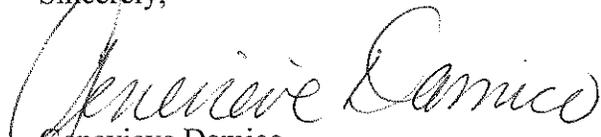
- 4) ROP, Pages 46 & 50, EU-ASHKARN1&2 & ASHSILO-1, respectively, 1. EMISSION LIMIT(S) for PM and PM₁₀ monitoring refer to taking visible emission readings at the bin vent filters. The permit requires that certain work practices be performed if “abnormal” visible emissions are observed. Please define “abnormal” or cite to the regulatory definition.

The following comments are typographical in nature:

- 5) ROP, Page 20, EU-KARN1, 1. EMISSION LIMIT(S) for sulfur dioxide (SO₂) Emission limits/Monitoring Testing Method – The permit references SC VI.7 and Appendix 3-1, Section 3.3-1 as the appropriate citations for monitoring of the SO₂ emission limit. These may be incorrect citations for the appropriate monitoring conditions. Please verify the conditions and make corrections as necessary.
- 6) ROP, Page 25, EU-KARN2, 1. EMISSION LIMIT(S) for SO₂ Emission limits/Monitoring Testing Method – The permit references SC VI.8 and Appendix 3-1, Section 3.3-1 as the appropriate citations for monitoring of the SO₂ emission limit. There is no condition 8 under this section. This appears to be an incorrect citation for the appropriate monitoring conditions. Please verify the conditions and make corrections as necessary.
- 7) ROP, Page 152, EU-WEADOCK7, 1. EMISSION LIMIT(S) for SO₂ and Carbon Monoxide (CO) references monitoring required under Sections VI.3 and VI.4. These conditions are requirements to operate a continuous opacity monitor (COM). It appears these may be incorrect citations for monitoring for SO₂ and CO emissions limits. Please verify the conditions and make corrections as necessary.
- 8) ROP, Page 158, EU-WEADOCK8, 1. EMISSION LIMIT(S) for SO₂ and CO references monitoring required under Sections VI.3 and VI.4. These conditions are requirements to operate a COM. It appears these may be incorrect citations for monitoring for SO₂ and CO emissions limits. Please verify the conditions and make corrections as necessary.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Jennifer Darrow, of my staff, at (312) 886-6315.

Sincerely,


Genevieve Damico
Chief
Air Permits Section