



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

APR 21 2016

REPLY TO THE ATTENTION OF

Annette Switzer  
Permit Section Supervisor  
Michigan Department of Environmental Quality  
Air Quality Division  
P.O. Box 30260  
Lansing, Michigan 48909-7760

Dear Ms. Switzer:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft construction permit for Louisiana Pacific Corporation, Newberry Plan, and (Permit number 99-05C). We provide these comments to help ensure that the project meets Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision. Below are our comments:

- 1) The unit EUKONUSTOH, which consists of two thermal oil heaters and economizers fired by natural gas and wood fuel, is controlled by a baghouse, baghouse #4. The permit conditions for this unit and control device have no operating parameters for the satisfactory operation of the baghouse. On page 17, unit EUTRIMSAW&GRIND, baghouse #10 controls emissions from the sawing and board grinding operations contain operating and monitoring permit conditions which are to be included in the malfunction abatement plan (MAP). The U.S. Environmental Protection Agency believes that the operating parameters for baghouse #4 should be included in the MAP and described fully in the monitoring and recordkeeping section of the draft permit.
- 2) On page 21 of the draft permit, there is a source-wide permit condition for FGFACILITY limiting the hazardous air pollutant (HAP) emissions of each individual HAP and aggregate HAPs to 9.9 and 24.9 tons per year respectively. This condition applies to all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment. The draft permit does not contain any material or operational restrictions regarding these HAP limits, but does require the permittee to determine the HAP content of any material as received and as applied. This condition appears to state that the permittee shall calculate the HAP emissions based on usage records assuming 100% emissions of HAPs from the material content. Please explain how the permittee will assure compliance with these HAP permit limits, including those process units such as EUDRYERRC and EUPRESS, that have individual HAP limits for pollutants such as formaldehyde, acetaldehyde, phenol, and acrolein, which are determined via a stack test conducted once every 5 years.

We would like to thank you again for working with us in making sure that these issues were resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely,



Genevieve Damico  
Chief  
Air Permits Section