



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

REPLY TO THE ATTENTION OF:

FEB 24 2016

Dan Maki
Upper Peninsula District Supervisor
Upper Peninsula District Office
Michigan Department of Environmental Quality
1504 West Washington Street
Marquette, Michigan 49855

Dear Mr. Maki:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP), permit number MI-ROP-N0780-20XX, for Louisiana Pacific Corporation – Newberry Plant located in Newberry, 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 Staff Report indicates that the source is considered a “synthetic minor” source in regards to Prevention of Significant Deterioration regulations of 40 C.F.R. § 52.21 because the source has accepted legally enforceable permit conditions limiting the potential to emit (PTE) of carbon monoxide (CO), particulate matter less than 10 microns (PM 10), nitrogen oxides (NO_x), and volatile organic compounds (VOC). In addition, the Staff Report indicates the source is considered a “synthetic minor” source in regards to hazardous air pollutant (HAP) emissions because the source has accepted legally enforceable permit conditions limiting the PTE of any single HAP regulated by the Clean Air Act, Section 112, to less than 10 tons per year and the PTE of all HAPs combined to less than 25 tons per year. Please provide further information in the Staff Report regarding the source’s actual emissions, potential emissions, and the permit terms and conditions that assure the synthetic minor limits (CO, PM10, NO_x, VOC and HAPs) are enforceable as a practical matter. For example, do any limits rely on pollution control devices and associated operating requirements? Are there production or operating limits associated with the emission limits? Are all emission activities considered in the source-wide limits?
- 2) As mentioned above, the Draft Permit indicates the source is considered a “synthetic minor” source for CO, PM10, NO_x, VOC and HAPs. Several emission units have emission limits for CO, PM10, NO_x, and VOC and the underlying applicable requirement is R336.1205. Please review the permit to ensure that any additional terms

originating from a permit to install that limit potential to emit (such as control equipment requirements) also include the underlying applicable requirement citation to R336.1205.

- 3) The Draft Permit includes emission units that are subject to compliance and assurance monitoring (CAM) pursuant to 40 C.F.R. Part 64. Language concerning the implementation of CAM is found in several special conditions for applicable emission units. In several instances the language is not up-to-date with the current CAM template available on the Michigan Department of Environmental Quality's website. For instance, see EUDRYERRC S.C. VII.9 Reporting. Please review the special conditions for emission units subject to CAM and verify the language is consistent with 40 C.F.R. Part 64 and revise as necessary.
- 4) Various Emission Units, SC. III. Process/Operational Restrictions. The process/operational restrictions for various emissions units include language referencing not operating the emission unit without the proper or satisfactory operation of the pollution control equipment (i.e., EUDRYERRC, EUCOATING, EUBAGHOUSE1, etc.). In these instances, there are no specific requirements regarding operation of the pollution control equipment. Please verify whether there are any specific applicable requirements, such as a malfunction and abatement plan, operations and maintenance plan, or provisions within those plans that are necessary to assure compliance with this general control equipment operating requirement, and include in the permit as appropriate.
- 5) Various Emission Units, SC. III. Process/Operational Restrictions. The process/operational restrictions for various emissions units include language referencing not operating the emission unit unless the malfunction and abatement plan approved by the Air Quality Division (AQD) District Supervisor is implemented and maintained (i.e., EUKONUSTOH). There are several other emission units (i.e., EUDRYERRC, EUBAGHOUSE1, etc.) that have pollution control equipment which require a malfunction and abatement plan, but do not include such a provision as a permit condition. Please review all emission units that have malfunction and abatement plans and revise the permit conditions to include a provision that the permittee shall not operate the emission unit unless the malfunction and abatement plan approved by the AQD District Supervisor is implemented and maintained is included as necessary.
- 6) EUPRESS, S.C. VI.1 Monitoring/Recordkeeping. The special condition indicates that the monthly record of the amount of PM, PM 10, NOx, CO, and VOCs shall be calculated using the hourly average emission rate per an acceptable method as approved by the District Supervisor from the most recent available emissions testing. This condition is not consistent with other emission units in the Draft Permit. For instance, the special condition for EUDRYERRC indicates that the monthly record of the amount of CO and VOC shall be calculated using the hourly average emission rate or an acceptable method as approved by the District Supervisor. Please review S.C. VI.1 for EUDRYERRC and update the condition, as necessary. In addition, please review all other emission units and update them to reflect the language provided in EUPRESS, as necessary.

- 7) EUDRYERRC, S.C. I Emission Limits. The emission limits table provided for EUDRYERRC includes a statement that if the tested emission factor for EUDRYERRC is lower than the emission limit for CO and/or VOC in this Section, the tested emission factor may be used to determine compliance with the tons per year limit. Please explain the intent of this statement and confirm that this condition may only be used to demonstrate compliance with the limit in the Draft Permit.
- 8) EUDRYERRC, S.C. I Emission Limits. The emission limits table provided for EUDRYERRC includes a statement that the VOC limits are based on a maximum drying rate of 16.50 oven dry tons/hour. Please update the language in this statement to reflect the emission unit description that 16.50 oven dry tons/hour is the maximum capacity of the dryer.
- 9) EUDRYERRC, S.C. VI.9 Monitoring/Recordkeeping. The Staff Report indicates that the indicator level of the wet electrostatic precipitator was selected based upon the level maintained during normal operation which is typically above 30 kilovolts (kV). The Draft Permit S.C. VI. 9 indicates that an hourly precipitator grid voltage less than 30 kV is an excursion. Please clarify whether or not the indicator level has been set at 30 kV and revise the Staff Report or Draft Permit, as necessary.
- 10) EUPRESS, S.C. VI.3 Monitoring/Recordkeeping and EUDRYERRC, S.C. VI.13 Monitoring/Recordkeeping. The special condition indicates that the permittee shall calculate the volume of coniferous wood. Please verify that the permittee is required to calculate the volume of non-coniferous wood in addition to the volume of coniferous wood to maintain compliance with EUPRESS, S.C. VIII.9 and EUDRYERRC, S.C. VIII.15.
- 11) FGCIRICEMACT and FGSIRICEMACT. The conditions presented for flexible groups FGCIRICEMACT and FGSIRICEMACT include language that references dates that have past. In addition, the language included in these flexible groups does not properly cite 40 C.F.R. Part 63, Subpart ZZZZ. For instance, in both flexible groups, S.C. III.1. indicates that the work practice standards specified in 40 C.F.R. 63.6602 are *recommended*. The language of 40 C.F.R. § 63.6602 indicates that if you own or operate an existing stationary reciprocating internal combustion engine, you must comply with the emission limitations and other requirements in Table 2c which apply to you. Please review the language for FGCIRICEMACT and FGSIRICEMACT to ensure they comply with the requirements of 40 C.F.R. Part 63, Subpart ZZZZ.
- 12) EUBAGHOUSE1, EUBAGHOUSE2, and EUBAGHOUSE3. The Staff Report and the Draft Permit indicate that EUBAGHOUSE1, EUBAGHOUSE2, and EUBAGHOUSE3 are subject to CAM. Each of the baghouses has a control device and the pre-control emissions of PM/PM 10 is greater than the major source threshold level. The sole monitoring for the control device is conducted by performing daily visible emissions readings. Please justify the sufficiency of the CAM plan for these units and detail whether daily visible emissions readings are the only monitoring item in the CAM plan.

In addition, please verify whether there are any specific provisions contained in the malfunction and abatement plan that are necessary to assure compliance and include in the permit as appropriate.

- 13) EUBAGHOUSE5, EUBAGHOUSE6, EUBAGHOUSE8, and EUBAGHOUSE9. The Staff Report does not include any discussion of the CAM applicability in regards to EUBAGHOUSE5, EUBAGHOUSE6, EUBAGHOUSE8, and EUBAGHOUSE9. Please provide further information concerning the CAM applicability of these baghouses. In addition, S.C. III.1 Process/Operational Restrictions indicates that the permittee shall not operate the process group equipment unless the baghouse is installed, maintained, and operated in a satisfactory manner. Please verify if there is an existing malfunction and abatement plan for each of these baghouses or a separate plan, currently not referenced, that details the installation, maintenance, and satisfactory operation of the baghouses.

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