



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

REPLY TO THE ATTENTION OF:

SEP 25 2014

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

Dear Mr. Mitchell:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft construction permit for Marquette Green Energy LLC. (Permit number 55-14). Below are our comments:

- 1) On page 29 of the draft permit, the source wide limits for the Hazardous Air Pollutants (HAPs) (grouping FGFACILITY) simply has a limit of 9.8 and 24.5 tons per year for the individual and total HAPs, respectively. As stated in rule 205, as well as Federal guidance such as the June 13, 1989 EPA memo entitled, "Guidance on Limiting Potential to Emit (PTE) in New Source Permitting "practically enforceable PTE limits should include production and/or operation limits in addition to emission limits. Emission limits alone are generally not practically enforceable for the purposes of limiting PTE unless there is a continuous monitoring system, or in certain cases where emissions can be accurately determined, for example, via mass balance calculations. The draft permit allows Marquette Green Energy to burn a combination of natural gas, wood and tire derived fuel, each having significantly different HAP content. In order for the HAP limits to be practically enforceable, the permit should require operational limits based on the same conditions that the stack test for HAPs was conducted.
- 2) Also as part of this same permit condition, item III. 1, the Process/Operational restrictions condition describes the continuous fugitive emissions control program for roadways and other miscellaneous areas. Please explain how this permit condition relates to the restriction on HAP emissions and for the HAP emissions from the boiler.
- 3) Furthermore, on page 29, condition VI. Monitoring/recordkeeping only requires the facility to provide test data and emission factors that are related to measurable parameters. Considering the use of tire derived fuels in the boiler, the permit should contain operating requirements that prohibit the burning of tire derived fuels at higher levels and percentages of total fuel combusted than what was tested for during the most

recent stack test that showed compliance with the emission limits and consider the HAP emissions from the emergency generator also located at the facility and part of grouping FG FACILITY.

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 at (312) 886-0671.

Sincerely,


Genevieve Damico, Chief
Air Permits Section