



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



REPLY TO THE ATTENTION OF:

Thomas Maki
Air Quality Division
Department of Environmental Quality
420 Fifth Street
Gwinn, Michigan 49841

Dear Mr. Maki:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft renewal of renewable operating permit for Marquette Board of Light and Power Shiras Steam Plant (Permit number MI-ROP-B1833-2013). To ensure that the source meets federal Clean Air Act requirements, that the permit provides necessary information so that the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, the U.S. Environmental Protection Agency has the following comments:

- 1) On page 5 of the staff report, MDEQ states that boiler number 3 is subject to 40 Code of Federal Regulations Part 63 Maximum Achievable Control Technology (MACT) Subparts UUUUU boilers number 1 and 2 are subject to Subpart DDDDD of the National Emissions Standards for Hazardous Air Pollutants. The draft permit contains only general, high level citations for several applicable federal standards, as specified in the staff report. MDEQ should include the detailed applicable requirements in the ROP. The applicable Title V operating permit regulations at 40 C.F.R. §70.6 require that a permit include emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. EPA's March 5, 1996 White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program provides clarifying guidance regarding the incorporation of applicable regulations into a Title V permit. EPA understands that compliance with Subpart UUUUU is not until April 16, 2016. However, Subparts A and DDDDD should include such detailed applicable requirements in the draft permit as necessary to ensure practical compliance with those standards.
- 2) MDEQ should clarify in the staff report that Compliance Assurance Monitoring (CAM) still applies, but the CAM plan will likely need to be revised to be consistent with monitoring in the MACT standards. The CAM applicability requirements do not apply to MACT standards, but CAM does continue to be an applicable requirement of this 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, of my staff, at (312) 886-0671.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the typed name and title.

Genevieve Damico
Chief
Air Permits Section