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

REPLY TO THE ATTENTION OF

AUG 1 1 2016

Annette Switzer
Permit Section Supervisor
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 Flakeboard America Limited, doing business as Arauco North America. (Permit number 59-16). We provide these comments to help ensure that the project meets the Clean Air Act (CAA) requirements, that the permit will provide the 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 is our comment:

> The draft permit does not specify test methods for determining compliance with the various permit limits. As EPA has discussed with MDEQ, EPA believes that each applicable permit condition should specifically identify the respective test method that the source will use to adequately demonstrate compliance with each emission limit in the permit. By not identifying the test methods, the public is not provided the necessary information to know in advance how compliance will be determined by the subject facility. EPA believes that the test method should be provided in the draft permit, while still providing MDEQ the flexibility to modify the testing methods in the event the test methods are modified or supplanted by more advanced or alternative test methods. The draft permit can contain permit language that provides MDEQ the flexibility that they approve actual the specific testing methods at the time of the test in advance of the test date.
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> Additionally, the concern we raise above on the lack of specific test methods in the draft permit leads to our next concern with only "test protocol" being given as the time period/operating scenario in the draft permit. An emission limit of pounds per hour, tons per year, or grains per dry standard cubic feet are unenforceable and not protective of the environment if they are not associated with an appropriate time averaging period. As MDEQ is well aware, averaging periods in permits are frequently rolled on an hourly to yearly basis depending on the emission limit and the underlying origin and authority for

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each of the permit emission limits. The necessary information on the averaging times for each permit term provides the public with the necessary information to know in advance how compliance will be determined by the test method and to ensure the permit meets the requirements of the CAA. The Part 70 regulations found in Section 70.6(a)(3)(i)(B), into which these draft permit conditions will ultimately be carried, requires periodic monitoring, including the use of test methods, sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit when the applicable requirement does not require period testing or monitoring.

EPA will continue to work with MDEQ in identifying test methods and appropriate compliance language in the draft permit. If you have any further questions, please feel free to contact Constantine Blathras at (312) 886-0671 or Sarah Rolfes at (312) 886-6551.

Sincerely,

Genevieve Damico

Genevieve Damico, Chief
Air Permits Section