



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUN 20 2012

Scott Miller

Jackson District Supervisor

Michigan Department of Environmental Quality

Jackson District Office

301 East Louis Glick Highway

Jackson, Michigan 49201

REPLY TO THE ATTENTION OF:

Dear Mr. Miller:

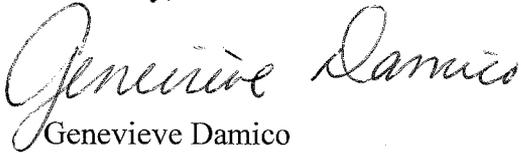
The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit, permit number MI-ROP-B2846-2012, for Consumers Energy J.R. Whiting Plant located in Erie, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information 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.) For each boiler, designated as emission units EU-BOILER1-S1, EU-BOILER2-S1, and EU-BOILER3-S1 in the draft permit, hourly emission limits for particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), and nitrogen oxide (NO<sub>x</sub>) are established and are determined based on a daily average. Emissions that exceed these limits for each averaging period for PM, via opacity monitoring, and SO<sub>2</sub> are reported quarterly. However, NO<sub>x</sub> emissions that exceed the established limit are not required to be reported quarterly. Please explain why quarterly reporting of excess NO<sub>x</sub> emissions is not required or add a requirement for quarterly reporting of excess NO<sub>x</sub> emissions.
- 2.) As part of compliance assurance monitoring (CAM) for the coal handling facility and the ash handling facility, denoted as emission units EU-COALHAND-S1 and EU-ASHHAND-S1 in the draft permit respectively, daily non-certified visual opacity observations are taken to ensure proper operation of the associated dust collectors. The indicator for these observations is whether visible emission are present from the exhaust of the dust collector. The averaging period for each observation is 2 continuous hours of visible emissions commencing at the time of discovery. The facility states in its CAM plan, revised July 2011, that they chose daily visual opacity observations because this monitoring technique does not require a certified observer like in a Method 9 test. Please explain how the monitoring required by the permit and the proposed CAM plan for the coal handling facility and the ash handling facility is sufficient to ensure compliance with the applicable opacity limit including why a non-certified observer is appropriate for these units and why approved EPA test methods such as Methods 9 and 22 are not required, or add conditions sufficient to do so in compliance with Parts 64 and 70.

- 3.) In the draft permit, both the coal handling facility and the ash handling facility require daily visual opacity observations to be conducted during periods of equipment operation. In the CAM plan the facility proposes to make these observations as well as record the results. The permit does not include a condition for recording the results of each observation. Please add a condition to the permit requiring recordkeeping of the results or explain why such a condition is not required.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico  
Chief  
Air Permits Section