

State Registration Number
A6497

RENEWABLE OPERATING PERMIT
June 14, 2022- STAFF REPORT ADDENDUM

ROP Number
MI-ROP-A6497-20XX

Purpose

A Staff Report dated April 4, 2022, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Jerry Greger, Plant Manager 989-734-3444
AQD Contact: District Inspector:	Michelle Luplow, Environmental Quality Analyst 517-294-9294
AQD Contact: ROP Writer:	Matt Karl, Environmental Quality Analyst 517-282-2126

Summary of Pertinent Comments

The following comments were received during the 30-day public comment period from USEPA Region 5 staff:

USEPA Comment 1

In Section 6 (Monitoring/Recordkeeping) of EUCRUSHING, EUTRUCKTRAFFIC, EUSTORAGE, and EUPUG-90, it states that Method 22 visible emission observations will be conducted monthly and Method 9 observations will be conducted if any visible emissions are observed during the Method 22 observation. However, it is not clear what corrective actions will be conducted if visible emissions are observed during the Method 9 observation. Please describe within the permit conditions or the off-permit plan (Abatement and Equipment Monitoring Program/Preventative Maintenance Program) what corrective actions must be taken after visible emissions are recorded with the Method 9 observation in order to ensure compliance with the opacity limits established in the permit.

AQD Response

Updated the Appendix 10 Fugitive Dust Plan to include specific emission unit/flexible group identification. Added "See Appendix 10" in emission unit/flexible groups with conditions to observe the opacity of visible emissions to better tie together the corrective actions that should be taken if excessive opacity visible emissions are observed. The company confirmed these proposed changes to the Appendix 10 Fugitive Dust Plan were acceptable. Revised EUCRUSHING, SC VI.1, EUTRUCKTRAFFIC, SC VI.1, EUSTORAGE, SC VI.1, and EUPUG-90, SC VI.2 to specify corrective actions if observed opacities exceed opacity limits.

EPA Comment 2

Condition III (1) of EUPUG-90 states that the emission unit shall not operate unless the associated baghouse collector is installed and operating properly. However, there is no operating ranges established within the permit or supporting documentation. Please indicate the operating ranges (temperature and pressure drop) for this baghouse within the permit conditions or the off-permit plan (Abatement and Equipment Monitoring Program/Preventative Maintenance Program) in order to ensure practical enforceability of the PM limit established in the permit and continued integrity of the baghouse.

AQD Response

The company informed AQD staff that the EUPUG-90 baghouse control device does not have a pressure drop gauge. Company staff perform visible emissions observations and conduct inspections to confirm the baghouse control is working properly. In the company's Preventative Maintenance Plan (PMP) under "Baghouse Collector-90 Pug Mill Semi-Annual Maintenance Check/Repairs" lists equipment, items to be inspected, the date of the inspection, comments on the condition and repairs made and operator's initials. For the baghouse, items to be inspected include condition of the bags, condition of the hangers, the side wall integrity, and the condition of the ductwork. Added EUPUG-90, SC III.2 to ensure proper operation of the baghouse.

Additionally, made corrections to FGPLANT1, SC VI.3. to clarify proper operating pressure drop range for the baghouse control.

EPA Comment 3

Please ensure that all off-permit plans are made available as part of the public record.

AQD Response

The AQD does not post Compliance Assurance Monitoring (CAM) plans. However, this facility also has a Preventative Maintenance Plan (PMP). It was an oversight that the PMP was not posted with the draft ROP and staff report during the public comment period. In the future, off permit plans such as the PMP will be posted during the public comment period and will be included on the AQD's website.

Changes to the April 4, 2022 Draft ROP

All changes proposed by USEPA in the 30-day public comment period as addressed by the AQD responses above have been incorporated into the draft ROP.