

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

**RENEWABLE OPERATING PERMIT**

ROP Number

B1754

**JANUARY 16, 2018 - STAFF REPORT  
ADDENDUM**

MI-ROP-B1754-20XX

**Purpose**

A Staff Report dated October 30, 2017, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). 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 R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	James C. Lemon, Plant Manager 517-265-5636
AQD Contact:	Mike Kovalchick Senior Environmental Engineer 517-780-5496

**Summary of Pertinent Comments**

Comments were received during the 30-day public comment period. The AQD's response to pertinent comments are as follows:

**EPA Comments**

**EPA Comment 1:**

The staff report indicates that EU009 is subject to Compliance Assurance Monitoring (CAM) pursuant to 40 CFR Part 64 and notes that the monitoring for the control device is daily recording of the pressure drop across the bag house and daily observations of the baghouse vent for opacity. The Staff Report states that these monitoring requirements are from 40 CFR Part 63, Subpart YYYYY – National Emissions Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities and that these requirements are considered to be presumptively acceptable monitoring for CAM. However, 40 CFR 60.10686(e) requires monitoring of the capture system and PM control devices, along with recordkeeping and reporting, according to the CAM requirements in 40 CFR Part 64. Furthermore, the permit does not include the applicable CAM requirements as specified in 40 CFR 64.6(c) and the MDEQ's CAM example template. Please verify CAM applicability and include the CAM requirements in the permit as applicable.

**AQD Response 1:**

CAM specific requirements need to be added to FG0009 to comply with 40 CFR Part 64. AQD agrees that presumptively acceptable monitoring is not applicable.

EPA Comment 2:

In order to clearly identify the origin and authority and permanency of the federal Consent Order provisions established in Consent Order No. EPA-5-17-113(a)-MI-05, please review and add Act 451, Section 324.5503(b) as an underlying applicable requirement and footnote 3 to Special Condition (SC) III.2 and SC IV.5 as appropriate.

AQD Response 2:

AQD agrees that in order to clearly identify the origin and authority and permanency of the federal Consent Order provisions established in Consent Order No. EPA-5-17-113(a)-MI-05, a footnote needs to be added to reference Act 451, Section 324.5503(b) as an underlying applicable requirement to FG0009, SC III.2 and SC IV.5.

EPA Comment 3:

The visible emissions limits (both labelled as SC I.2) list test protocol as the time period/operating scenario. FGMACT-YYYYY consists of FG0009 which does include a time period/operating scenario for similar requirements. We recommend that the time period/operating scenario for the conditions in FGMACT-YYYYY be updated to reflect an appropriate averaging time consistent with the other visible emissions limits to which this emission unit is subject.

AQD Response 3:

AQD agrees that the time period/operating scenario for conditions in FGMACT-YYYYY needs to be updated to reflect an appropriate averaging time consistent with the other visible emission limits to which the EAF is subject to in FG0009.

EPA Comment 4:

The origin and authority for FGSI-RICEMACT SC III.4 appears to inadvertently refer to the requirements for compression ignition combustion engines and may need to be updated to cite to the requirements for spark ignition combustion engines.

AQD Response 4:

AQD agrees that the proper citation should be 40 CFR 63.6625(j) for FGSI-RICEMACT, SC III.4.