

State Registration Number
B1909

RENEWABLE OPERATING PERMIT
November 8, 2024 - STAFF REPORT ADDENDUM

ROP Number
ROP0000429 v5.0

Purpose

A Staff Report dated September 16, 2024, 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 Officials:	Robert Meacham, Senior Environmental & Facility Engineer, 231-739-2794 James Wright, Vice President, 231-739-2761
AQD Contact:	Eric Grinstern, Environmental Quality Specialist 616-558-0616

Summary of Pertinent Comments

Comments were received from USEPA during the 30-day public comment permit. Comments were received on October 15, 2024, and are outlined below.

EPA Comment No. 1:

Special condition VI.1 for EU-BULK-BOND requires non-certified visible emission readings only once per week while the emission unit is operating as a means of monitoring compliance with the applicable emission limit. This potentially leaves room for the emission unit in question to be operating and not have any monitoring that would assure compliance with the applicable PM emission limits under SC.I 1 & 2. EPA suggests this condition be revised to include language that provides for a monitoring method to be required whenever the unit is actually operating. EPA further suggests that any other similar condition in the ROP that has potential for no monitoring to be required while an emission unit is actually operating to be revised as well and include such language necessary to ensure appropriate monitoring.

AQD Response No. 1:

In response to USEPA's suggestion to revise visible emission monitoring language to require monitoring whenever an emission unit is actually operating, the following modifications were made:

EU-BULK-BOND, Special condition VI.1 requires weekly non-certified visible emission readings, although the facility actually conducts daily non-certified visible emission observations and records the results as part of the facility's "Daily Environmental Check Sheet". Special condition VI.1. was modified to require daily non-certified visible emissions readings while the emission unit is operating.

EU-NEW-SAND, Special condition VI.1 requires weekly non-certified visible emission readings, although the facility actually conducts daily non-certified visible emission observations and records the results as part of the facility's "Daily Environmental Check Sheet". Special condition VI.1. was modified to require daily non-certified visible emissions readings while the emission unit is operating.

EPA Comment No. 2:

EU-DUCTILE-IRON contains an emission limit of 10% opacity under SC I.4 with the only applicable monitoring/testing method referenced being “verification of visible emissions [...] performed and documented once weekly by non-certified visible emissions readings while the emission unit is operating, per Appendix 3” under SC VI.4. It is not clear how a once weekly verification of visible emissions by a non-certified reading ensures compliance with a continuous 10% opacity limit under this condition or in Appendix 3. EPA suggests for this and any other similar condition within the ROP with monitoring that is related to a specific opacity to have an approved testing method included when necessary.

AQD Response No. 2:

In response to USEPA’s suggestion to have an approved testing method with monitoring related to a specific opacity, the following modifications were made:

EU-DUCTILE-IRON, Special condition VI.4 requires weekly non-certified visible emission readings, although the facility actually conducts daily non-certified visible emission observations and records the results as part of the facility’s “Daily Environmental Check Sheet”. Special condition VI.4. was replaced with a visible emission condition that requires daily non-certified visible emissions readings while the process is operating and requires a USEPA Method 9 certified emission observation to be conducted if any visible emissions are detected in order to determine the actual opacity.

EU-MP-RBB, Special condition VI.1 requires weekly non-certified visible emission readings, although the facility actually conducts daily non-certified visible emission observations and records the results as part of the facility’s “Daily Environmental Check Sheet”. Special condition VI.1 was replaced with a visible emission condition that requires daily non-certified visible emissions readings while the process is operating and requires a USEPA Method 9 certified emission observation to be conducted if any visible emissions are detected in order to determine the actual opacity.

EPA Comment No. 3:

The CAM plan for this ROP also includes specific opacities (10-20%) that use non-certified visible emission observations to be taken daily as their monitoring requirements. It is not clear though how a non-certified visible emission observation taken daily is capable of ensuring compliance with the specific opacities listed within the plan. In addition, the QA/QC component of the CAM plan only lists “routine preventative maintenance” as part of its criteria. EPA suggests that the monitoring requirements for opacity as specified by the CAM plan be revised to also include an applicable approved test method instead of just a daily non-certified visible emission observation, and for the QA/QC component to be more specific with how it will ensure that the other sections of CAM continue to reasonably assure compliance with all applicable requirements.

AQD Response No. 3:

In response to USEPA’s suggestion to have an approved testing method for opacity instead of just a daily non-certified visible emission observation with monitoring related to a specific opacity, the following modifications were made:

EU-MP-RBB: the facility was requested to modify the CAM plan monitoring requirements to require a USEPA Method 9 certified emissions observation if visible emissions are detected. The CAM monitoring requirement will then match the modifications made to Special condition VI. 1, requiring USEPA Method 9 certified emission observations if visible emissions are detected. EU-MP-RBB has an opacity limit of 10%.

EU-ACS-SAND: the facility was requested to modify the CAM plan monitoring requirements to require a USEPA Method 9 certified emissions observation if visible emissions are detected. EU-ACS-SAND does not have an opacity limit more restrictive than the 20% opacity limit in General Condition No. 11.

EU-WEST-CUPOLA-1: the facility was requested to modify the CAM plan monitoring requirements to require a USEPA Method 9 certified emissions observation if visible emissions are detected. EU-WEST-CUPOLA-1 does not have an opacity limit more restrictive than the 20% opacity limit in General Condition No. 11.

EU-SHAKEOUT: the facility was requested to modify the CAM plan monitoring requirements to require a USEPA Method 9 certified emissions observation if visible emissions are detected. EU-SHAKEOUT does not have an opacity limit more restrictive than the 20% opacity limit in General Condition No. 11.

In response to USEPA's suggestion for the QA/QC component of the CAM plan to be more specific with how it will ensure that the other sections of CAM continue to reasonably assure compliance with all applicable requirements, the facility was requested to expand the QA/QC component of the CAM plan to provide additional information and be more specific.

Changes to the September 16, 2024 Draft ROP

Changes were made to the ROP in response to comments received by USEPA on October 15, 2024.

Below is a summary of changes made:

EU-BULK-BOND: Special Condition VI.1. was modified to require daily non-certified visible emissions readings while the emission unit is operating. The condition previously required weekly non-certified visible emission readings.

EU-NEW-SAND: Special Condition VI.1. was modified to require daily non-certified visible emissions readings while the emission unit is operating. The condition previously required weekly non-certified visible emission readings.

EU-DUCTILE-IRON: Special Condition VI.4. was replaced with a visible emission condition that requires daily non-certified visible emissions readings while the process is operating and requires a USEPA Method 9 certified emission observation to be conducted if any visible emissions are detected in order to determine the actual opacity. The condition previously required weekly non-certified visible emission readings. The new condition:

The permittee shall perform and document non-certified visible emissions observations on a daily basis when operating during daytime hours. Each observation shall be for a minimum timeframe of 5 minutes. If during the observations there are any visible emissions detected, a USEPA Method 9 certified emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from the emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reasons for any visible emissions in excess of 10% opacity observed, and any corrective actions taken shall be kept on file and made available to the Department upon request. **(R 336.1213(3))**

EU-MP-RBB: Special Condition VI.1. was replaced with the PTI shell visible emission condition that requires daily non-certified visible emissions readings while the process is operating and requires a USEPA Method 9 certified emission observation to be conducted if any visible emissions are detected in order to determine the actual opacity. The condition previously required weekly non-certified visible emission readings. The new condition:

The permittee shall perform and document non-certified visible emissions observations on a daily basis when operating during daytime hours. Each observation shall be for a minimum timeframe of 5 minutes. If during the observations there are any visible emissions detected, a USEPA Method 9 certified emissions observation shall be conducted for a minimum of 15 minutes to determine the actual

opacity from the emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reasons for any visible emissions in excess of 10% opacity observed, and any corrective actions taken shall be kept on file and made available to the Department upon request. **(R 336.1213(3))**

CAM Plan: For EU-MP-RBB, EU-ACS-SAND, EU-WEST-CUPOLA-1, and EU-SHAKEOUT, the facility was requested to modify the CAM plan monitoring requirements to require a USEPA Method 9 certified emissions observation if visible emissions are detected. The facility will submit the modified CAM plan, with the modified visible emission requirements, prior to issuance of the ROP.

CAM Plan: The facility was requested to expand the QA/QC component of the CAM plan to provide additional information and be more specific. The facility will submit the modified CAM plan, with the expanded QA/AC, prior to issuance of the ROP.