

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
B1966

RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-B1966-20XX

JULY 12, 2018 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated April 23, 2018, 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:	Zachary Halkola, Chief Operating Officer 906-885-7905
AQD Contact:	Shamim Ahammod, Environmental Engineer 906-235-1377

Summary of Pertinent Comments

On May 23, 2018, AQD received comments from EPA. The comments and AQD's response follow:

Comment

Request for describing the functions of the following boilers at the facility in the staff report: EU-PP03, EU-PP04, and EU-PP07.

AQD Response

EU-PP03, 04 and 07 were all used to produce steam and/or heat. PP03 and 04 have not been used for several years.

Changes to the 04/23/2018 Draft ROP

Comment

Request to correct typo in EU-PP07 Emission Table, Section III.1.

AQD Response

Correction has been made from "EU-PP03" to "EU-PP07."

Comment

Request for adding associate monitoring requirements to assure compliance with the fuel requirement in EU-PP07 Emission Table, Section VI.

AQD Response

The following condition was added to EU-PP07 Emission Table, Section VI.1.:

The permittee shall monitor and record, in a satisfactory manner, the amount of natural gas combusted on a daily basis.² **(R 336.1205(3))**

Comment

Request to add footnote "2" in the FG-PP05 and 06 Emission Table, Section III.2.; Section IV.1.; Section V.1.; Sections VI.1 through 3; Section VII.4.; and Sections IX.1 through 5.

AQD Response

Footnote "2" has been added where appropriate.

Comment

In Section E. Non-Applicable Requirements, request to ensure that all Section E. Non-Applicability permit shield determinations include standard specific and uni-specific justifications.

AQD Response

AQD has reviewed the documentation and has changed Section E to read:

"At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii)."