

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B2132

November 22, 2017 STAFF REPORT ADDENDUM

MI-ROP-B2132-2017

Purpose

A Staff Report dated July 10, 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 45-day EPA comment period as described in R 336.1214(6). In addition, this addendum describes any changes to the proposed ROP resulting from these pertinent comments.

General Information

Responsible Official:	Charlene Hudson, Director, Power Supply & Distribution 734-324-7158
AQD Contact:	Stephen Weis, Senior Environmental Engineer 313-456-4688

Summary of Pertinent Comments

A comment was received from US EPA during the 45-day EPA comment period.

US EPA Comment:

The U.S. Environmental Protection Agency has reviewed the proposed Renewable Operating Permit (ROP) for Wyandotte Municipal Services, State Registration Number B2132, located in Wyandotte, 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 comment:

EUUNIT7BLR: In order to clearly identify the origin and authority and permanency of the federal Consent Decree provisions established in Permit-to-Install 2-16, please review and add Act 451, Section 324.5503(b) as an underlying applicable requirement and footnote 3 to these provisions from PTI 2-16 as appropriate.

Changes to the October 3, 2017 Proposed ROP

In response to the US EPA Comment, some changes were made to the EUUNIT7BLR Emission Unit table. Special Conditions I.1, II.1 and III.2 were changed to include Act 451 324.5503(b) as a listed underlying applicable requirement, and footnote 3 was added to each of these conditions to denote that these conditions are federally enforceable and were originally established in the consent decree settling, "U.S. v City of Wyandotte, Civil Action No. 11-cv-12181" and also pursuant to Act 451, Section 324.5503(b), and will remain in effect after termination of the consent decree.