

State Registration Number

B2875

RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-B2875-20XX

JUNE 13, 2019 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated April 22, 2019, 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:	William Gough, Factory Manager 989-673-3126
AQD Contact:	Meg Sheehan, Environmental Quality Analyst 989-439-5001

Summary of Pertinent Comments

The EPA was the only party to submit pertinent comments during the 30-day public comment period. Comments from the EPA included:

1. Clarify the term “abnormal visible emissions” for SC VI.1 for both EUPACKAGEBOILER3 and FG2KILNS.
2. Verify the averaging time required by the underlying applicable requirement for SC I.3 for EUBOILER4.
3. Consider updating FG635DEXGAS1BOILER in accordance with the most recent Michigan EGLE’s MACT permit condition templates.

Changes to the April 22, 2019 Draft ROP

EUPACKAGEBOILER3:

- SC VI.1 – Changed “abnormal visible emissions” to “any visible emissions”.

EUBOILER4:

- SC I.3 – The Time Period/Operating Scenario was changed from “30-day average per calendar month” to “Hourly”. SC V.1 and FG635DEXGAS1BOILER SC V.4 were added as the Monitoring/Testing Methods.
- SC III.1 – Deleted “within 90 days of permit issuance”. This condition originated in a Permit to Install (PTI No. 44-14), which required the source to submit a Malfunction Abatement Plan (MAP) within 90 days of the PTI issuance. The source is still required to have a MAP for this emission unit.
- SC V.1 – This condition was added to this emission unit from the General Conditions.

FG635DEXGAS1BOILER:

- SC III.6, VII.14 and 15, and IX.5 through 8 were added from the Boiler MACT template.
- SC VII.12 – Additional language (a. through c.) was added to this condition from the Boiler MACT template.

Staff Report Clarification:

- The source description indicates there are natural gas and coal fired boilers at this source. That is incorrect. There are no longer any coal fired boilers at this source.

The EPA verbally suggested including the following additional information in the staff report:

- The initial stack testing conducted on EUBOILER4 as required by PTI 44-14 to verify NOx and CO emissions. The testing was performed on December 11, 2014. CO was tested using EPA Methods 1, 2, 3A, 4, and 10. The CO results were 0.00 lb/MMBTU and 0.07 pph. NOx was tested using EPA Methods 1, 2, 3A, 4, and 7E. The NOx results were 11.59 pph. These results were considered acceptable to AQD.
- The pulp pellet mills system removal. As part of the October 3, 2018 compliance inspection, staff confirmed that the pellet mills system had been removed from the facility. These emission units were previously included in FGPULP but were removed during this renewal. EUPULPDRYER was therefore the only emission unit in FGPULP so it became an emission unit table rather than a flexible group table.