

State Registration Number

B2876

RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-B2876-20XX

SEPTEMBER 18, 2019 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated July 1, 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:	Ken Bennett, Factory Manager 810-679-2241 ext. 4422
AQD Contact:	Meg Sheehan, Environmental Quality Analyst 989-439-5001

Summary of Pertinent Comments

Comments from the EPA included:

1. Correct the Monitoring/Testing Methods of SC I.2 in Section 1 for EU-PULPDRYER.
2. Include monitoring and recordkeeping sufficient to assure compliance with the NOx limit in SC I.1 for EU-RILEYBLR
3. Include enforceable monitoring and recordkeeping conditions (including associated calculations) sufficient to assure compliance with the NOx limit in SC I.3 on an ongoing basis for EU-RILEYBLR.
4. Correct SC VI.1 under FG-LIMEKILNS so that “abnormal visible emissions” is replaced with “any visible emissions.”
5. Expand the information in the Staff Report to further address the timeframes for construction under Michigan’s New Source Review Program for FG-SUGAR.
6. Include monitoring and recordkeeping sufficient to assure compliance with the PM limits in SC I.1, I.3, and I.5 on an ongoing basis under FG-SUGAR.

Michigan Sugar Company also commented on the draft ROP. The company disagrees with the requirements of SC VI.1 under FG-LIMEKILNS. Specifically, they believe a Method 9 visible emissions observation or other corrective action should be triggered by “abnormal” visible emissions rather than “any” visible emissions. EGLE maintains that a definition does not exist for the term abnormal, therefore making quantification of abnormal visible emissions impossible. EGLE believes the requirements of SC VI.1 are necessary to ensure compliance with the particulate matter emission limit in SC I.1 and are not overburdensome.

Changes to the July 1, 2019 Draft ROP

EU-PULPDRYER:

- SC I.2, Monitoring/Testing Method – SC V.2 and V.3 were removed.

EU-RILEYBLR:

- SC I.1, Monitoring/Testing Method – Added SC V.2
- SC I.3, Monitoring/Testing Method – Added SC VI.6
- SC V.2 – Added the following condition: “Within one year of the issuance of this permit, and between a 24 to 37-month period thereafter, the permittee shall verify NOx emission rates from EU-RILEYBLR by testing at owner’s expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD for review and approval. Verification of emission rates includes the submittal of a complete test report of the results to the AQD within 60 days following the last date of the test. **(R 336.1213(3))**”
 - The AQD believes stack testing once every 24 – 37 months in conjunction with the work practice standards required by SC IX.5 under FG-63-FD-EXNGBLR is sufficient to ensure compliance with SC I.1 under EU-RILEYBLR. The first stack test for EU-RILEYBLR was conducted on February 17, 2016; the average NOx emission rate of the three test runs was 0.104 lb/MMBTU. Additionally, four annual Relative Accuracy Test Audits (RATA) have been conducted since EU-RILEYBLR was installed in 2015. EU-RILEYBLR passed all four RATAs, and the CEMS data remained below the permitted limit of 0.11 lb NOx/MMBTU.
- SC VI.6 – Added the following condition: “The permittee shall calculate 12-month rolling NOx emissions according to the equation in Appendix 7 to verify compliance with SC I.3. **(R 336.1213(3))**”
 - The facility is required to annually report its emissions to the Michigan Air Emissions Reporting System (MAERS). Since EU-RILEYBLR was installed in 2015, NOx emissions have remained below 28 tons per year. The AQD believes that this information as well as the newly required stack testing under SC V.2 demonstrates sufficient monitoring.

FG-LIMEKILNS:

- SC VI.1 – “Abnormal visible emissions” was changed to “any visible emissions”

FG-SUGAR:

- SC I.1, 3, & 5, Monitoring/Testing Method – Added SC III.1 and VI.3

Appendix 7:

- The following equation was added for calculating yearly NOx emissions for EU-RILEYBLR:

“Natural gas heat content = 1.02 MMBTU/MCF

NOx ton per year emissions =
(MCF natural gas/day) X 1.02 MMBTU/MCF X (Most recent stack test results) = NOx lb/day

Then each month is summed, converted to tons, and followed by a 12-month rolling total.”

Staff Report Clarification:

- As stated in the Staff Reported dated July 1, 2019, not all process expansion elements related to FG-SUGAR have been fully constructed/started as of the issuance of this ROP renewal. Pursuant to R 336.1201(4), if the installation, reconstruction, or relocation of the permitted equipment has

not commenced within, or has been interrupted for 18 months, then the permit shall become void. PTI 21-15B was approved on May 16, 2017. On September 1, 2017 and October 11, 2018, the AQD received progress reports from the company regarding the installation of the equipment permitted under PTI 21-15B. The company has indicated they are aware of the requirements set forth by R 336.1201(4) and that construction will not be interrupted for longer than 18 months.