

State Registration Number

B3350

RENEWABLE OPERATING PERMIT

November 15, 2021 - STAFF REPORT ADDENDUM

ROP Number

MI-ROP-B3350-2022

Purpose

A Staff Report dated June 7, 2021, 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:	LaMarcus Keels, Plant Manager 734-783-8519
AQD Contact:	Sam Liveson, Environmental Engineer 313-405-1357

Summary of Pertinent Comments

1. US EPA Region 5 made the following comment:

EPA Comment: Under FG-WETMACHINE in Condition IV(1) it states, “The permittee shall not operate FG-WETMACHINE unless the oil mist collectors are installed, maintained, and operated in a satisfactory manner.” However, there is no description, definition or indication of what satisfactory manner means or how to achieve it. There should be a reference to the PMP/MAP with specific language on how to determine compliance with the limits established in the permit.

AQD Response: FG-WETMACHINE Condition IV(1) originates from Permit to Install (PTI) No. 95-07A. The condition has not been altered from this PTI. As a rule, AQD does not modify ROP conditions that originate from PTIs. In order to modify this condition, PTI 95-07A would have to be changed, and the updated PTI would be rolled into the ROP.

FG-WETMACHINE Condition III.1 requires implementation and maintenance of the malfunction abatement plan (MAP). The facility’s MAP discusses filter static pressures as the variables to monitor to detect a malfunction or failure; monitoring procedures in the “Activity & Frequency Matrix” for mist collectors and dust collectors; and inches of water at which to replace filters or shut down the units.

This staff report addendum serves to explain that “installed, maintained, and operated in a satisfactory manner” in Condition IV.1 means implementing and maintaining the MAP as required in Condition III.1.

FG-WETMACHINE Condition III.1 is below:

- III.1. The permittee shall not operate FG-WETMACHINE unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the oil mist collectors, has been submitted within 45 days of permit issuance, and is implemented and maintained. If, at any time, the MAP fails to address or inadequately addresses an event that meets the characteristics of a

malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1910, R 336.1911)

Per Rule 911(2),

- (2) A malfunction abatement plan required by subrule (1) of this rule shall be in writing and shall, at a minimum, specify all of the following:
 - (a) A complete preventative maintenance program, including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - (b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - (c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

2. AQD made the following comment:

AQD Comment: As a result of a discussion with USEPA and FCA regarding fuel oil conditions in FG- BLR1&BLR5, FCA clarified that the diesel fuel line and diesel fuel tank associated with FG- BLR1&BLR5 have been removed. Accordingly, AQD determined that conditions related to firing diesel fuel are void per Rule 201(5). Rule 201(5) states in part, "Upon the physical removal of the process or process equipment, or upon a determination by the department that the process or process equipment has been permanently shut down, the permit to install shall become void..."

AQD Response: AQD will remove conditions and descriptions related to firing diesel fuel from FG- BLR1&BLR5.

3. FCA made the following comment regarding FG-GAS-DISP, special condition VI.1:

FCA Comment: This is unduly restricting us. The facility is allowed to use 135,000 gallons of gasoline yearly, which means that the 10,000 gallons/month of gasoline will be exceeded.

AQD Response: AQD recognizes that FG-GAS-DISP, special condition VI.1, as written, is ambiguous. The condition suggests the gasoline throughput is limited to 10,000 gallons per month, when actually, throughput may be less than 10,000 gallons gasoline or less than 100,000 gallons of gasoline per month. AQD will update special condition VI.1 to clarify the recordkeeping requirement.

4. FCA made the following comment regarding FG-DYNOS, special conditions V.1-3:

FCA Comment: These terms here do not clearly discuss the frequency of the testing. Typically, we have one test every permit cycle. However, as written here, it is conceivable we can do one test every five years, and have to do a second test 180 days after the issuance of a renewal permit. This could subject us to two tests in a permit cycle when EGLE does not renew our permit on time.

AQD Response: Special condition V.2 specifies frequency of testing. AQD believes the condition is clear. However, AQD will modify the condition to include the name of this specific ROP in the condition to clarify that testing is required within the specified number of days of issuance of this permit. The same modification will occur to FG-BLR1&BLR5, special condition V.2, because it has a similar requirement for testing.

Changes to the June 7, 2021 Draft ROP

The following changes were made to the June 7, 2021 Draft ROP:

Emission Unit Summary Table

1. Emission Unit Description for EU-BOILER1 and EU-BOILER5 by removing “and distillate oil” from the descriptions. The updated descriptions now read “60 MMBTU/hr natural gas-fired boiler. Located at the Trenton Engine Plant.” And “180 MMBTU/hr natural gas-fired boiler. Located at Trenton Engine Plant.” respectively.

Flexible Group Summary Table

1. Update Description for FG-BLR1&BLR5 by removing “and distillate oil” from the description. The updated description now reads “Two natural gas-fired boilers rated at 60 MMBTU/hr and 180 MMBTU/hr.”

FG-DYNOS

1. Testing/Sampling – Update the first phrase in condition V.2 to read, “Within 180 days of the effective date of MI-PTI-B3350-20XX”. The original phrase read, “Within 180 days of permit issuance”.

FG-BLR1&BLR5

1. Update Description by removing “and distillate oil” from the description. The updated description now reads “Two natural gas-fired boilers rated at 60 MMBTU/hr and 180 MMBTU/hr.”
2. Emission Limit(s) – Deleted SC I.2, I.4, I.6, and I.7 to remove emission limits for burning distillate oil.
3. Material Limit(s) – Deleted SC II.1 to remove the No. 2 fuel oil gallon limit.
4. Process/Operational Restriction(s) – Deleted SC III.1 to remove the No. 2 fuel oil sulfur content requirement. Deleted SC III.2 to remove the requirement to burn only natural gas or virgin No. 2 fuel oil.
5. Testing/Sampling – Update the first phrase in condition V.2 to read, “Within 365 days of the effective date of MI-PTI-B3350-20XX”. The original phrase read, “Within 365 days of permit issuance”.
6. Testing/Sampling – Deleted SC V.4 to remove the distillate oil stack testing requirement.
7. Monitoring/Recordkeeping – Deleted SC VI.3 to remove monthly monitoring of No. 2 fuel usage.
8. Monitoring/Recordkeeping – Deleted SC VI.4 to remove the recording of hours burning liquid fuel.

9. Other Requirement(s) – Deleted IV.1 to remove the 40 CFR Part 63 Subpart JJJJJJ requirement for combusting liquid fuel.

FG-GAS-DISP

1. Monitoring/Recordkeeping –SC VI.1.a is revised as follows:

Draft Condition:

1. **Record of Gasoline Throughput**

- a. A record of gasoline throughput is necessary to be able to demonstrate that monthly throughput is less than 10,000 gallons and such record must be made available to USEPA or to EGLE within 24 hours of a request. **(40 CFR 63.11116(b))**

Proposed Condition:

1. The permittee shall keep records of the monthly throughput of gasoline through FG-GAS-DISP. Records of the monthly throughput must be available within 24 hours of a request by the administrator to document your gasoline throughput. **(40 CFR 63.11116(b), 40 CFR 63.11117(d))**

Appendix 6

1. In the first row of the table, include ROP revision number “202100064” as the application that incorporated PTI 95-07A into the ROP.