

**Purpose**

A Staff Report dated September 25, 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 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:	Mark Ellerbrock, Plant Manager 517-265-4211
AQD Contact:	Mike Kovalchick, Senior Environmental Engineer 517-416-5025

**Summary of Pertinent Comments**

Comments were received during the 30-day public comment period. The AQD's response to pertinent comments are as follows:

**EPA Comments**

EPA Comment 1:

For EU-Paint 1, the permit record includes a document entitled, "Management of Abatement Equipment CK#3," last revised 5/6/2016. Please verify that this document meets the content requirements of the Malfunction Abatement Plan (MAP) and FG-MACTPPPP: Startup, Shutdown and Malfunction Plan (SSMP) or include additional documentation in the permit record as necessary.

AQD Response 1:

An updated MAP was submitted to AQD in February 2017 that addresses all of the required elements listed under R 336.1911 for the water-wash system, rotary carbon concentrator and the regenerative thermal oxidizer. The updated MAP has now been posted with the application and is available for review.

Furthermore, the following requirement does not apply because the control equipment is not used for compliance with 40 CFR 63, Subpart PPPP: FG-MACTPPPP, Special Condition (SC) III.3. requires an SSMP in accordance with 40 CFR 63.6(e)(3) and 40 CFR 63.4500(c) if the source is using the emission capture system and add-on control device compliance option.

EPA Comment 2:

For EU-Paint 1, the staff report indicates that EU-Paint 1 is subject to Compliance Assurance Monitoring (CAM) pursuant to 40 CFR Part 64, however, the permit does not include the applicable CAM requirements as specified in 40 CFR 64.6(c).

AQD Response 2:

EU-Paint 1 at the stationary source is subject to CAM. This emission unit has a control device and potential pre-control emissions of volatile organic compounds greater than the major source threshold level. The monitoring for the control device is desorption gas inlet temperature in the concentrator, pressure drop

across the concentrator filter and monitoring of the temperature in the combustion chamber of the thermal oxidizer in order to ensure efficient capture and destruction of the emissions. The facility has a MAP for the control equipment identified as Malfunction Abatement Plan-Adrian Operations Management System last revised 2/13/2017. The applicable CAM requirements have been added to EU-Paint 1 and an updated CAM plan requested.

EPA Comment 3:

For EU-Paint 1, although the permit includes recordkeeping requirements for calculating emissions on a mass balance basis, the permit does not specify the emissions calculations when the RTO and the rotary carbon concentrator are in operation. Please revise the permit and the Staff Report as appropriate to address the specific monitoring, recordkeeping, and calculations necessary to assure compliance with the VOC emissions limits when the control equipment is operating, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

AQD Response 3:

Performance testing is required according to EU-Paint 1, SC V.2 and SC V.3. SC V.3 covers the capture efficiency and SC V.2 covers the destruction efficiency. SC VI.2, SC VI.3 and SC VI.4 require monitoring of the rotary carbon concentrator gas inlet temperature, pressure drop across the filter in the rotary carbon concentrator and the RTO combustion chamber temperature, respectively. Concerning the recordkeeping found in SC VI.7, SC VI.7.b requires the material usage to be tracked during RTO operation and when it is not operating and SC VI.7.d specifies the monthly emission calculations during both modes of operation as well. Therefore, the requirements of 40 CFR 70.6(a)(3) and (c)(1) are satisfied with the current conditions as written. The term "RTO operation" automatically includes the operation of the rotary carbon concentrator because one can't be operated without the other. The recordkeeping requirements are spelled out in the permit as appropriate.

EPA Comment 4:

For EU-P5, Section II has two material limits that include a "footnote 2" federally enforceable designation, but the permit identifies the underlying applicable requirement as R 336.1225. Please review these limits to verify whether the "footnote 1" state enforceable-only designation or the "footnote 2" designation is correct, and revise the permit as appropriate.

AQD Response 4:

Two material limits in EU-P5 Sections II were incorrectly identified with a "footnote 2," which is a federally enforceable designation. The permit identifies the underlying applicable requirement as R 336.1225 so it has been revised instead to include "footnote 1" which is state enforceable-only designation.

EPA Comment 5:

For EU-Paint 3, the VOC limit in Section I does not include a "footnote 2" designation. Please verify whether the limit is a Title I federally enforceable condition pursuant to Rule 201(1)(a) and include footnote 2 as appropriate. In addition, the monitoring and recordkeeping requirements in SC VI.4 appear to be missing recordkeeping requirements for materials reclaimed. Please revise the permit as necessary to address the specific monitoring and recordkeeping requirements necessary to assure compliance with the VOC emissions limit, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

AQD Response 5:

The VOC limit in Section I did not include a "footnote 2" which is a federally enforceable designation. The permit has been revised to include this designation. In addition, for the monitoring and recordkeeping requirements in SC VI.4, the word "reclaimed" has been added to the permit condition per Rule 213(3). The recordkeeping requirements are spelled out in the permit as appropriate.

EPA Comment 6:

The flexible group description for FG-MACTPPPP misidentifies 40 CFR Part 63, Subpart PPPP as Surface Coating of Automobiles and Light Duty Trucks. Please revise the description to identify Subpart PPPP as Surface Coating of Plastic Parts and Products.

AQD Response 6:

The description in the "FLEXIBLE GROUP SUMMARY TABLE" was corrected to identify 40 CFR 63, Subpart PPPP as Surface Coating of Plastic Parts and Products.

**Changes to the September 25, 2017 Draft ROP**

The following changes were made to the revised draft ROP to address comments for the following reasons:

EPA Comment #2:

The applicable CAM requirements have been added to EU-Paint 1 consistent with the MDEQ's CAM example template and an updated CAM plan has been requested from the company.

EPA Comment #4:

Two material limits in EU-P5, SC II.2 and SC II.3. previously included a "footnote 2" which is a federally enforceable designation. The permit has been revised instead to include "footnote 1" which is state enforceable-only designation.

EPA Comment #5:

A "footnote 2" has been added to the VOC limit in EU-P5, SC I.1 to indicate this is a federally enforceable limit. The word "reclaimed" has been included in the recordkeeping condition in EU-P5, SC VI.4.a.

EPA Comment #6:

The description in the "FLEXIBLE GROUP SUMMARY TABLE" was corrected so that the description in the table matches the description in the "FG-MACT PPPP FLEXIBLE GROUP CONDITIONS." The permit now includes the correct description to identify 40 CFR 63, Subpart PPPP as Surface Coating of Plastic Parts and Products.