

State Registration Number
N0890

RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-N0890-20XX

JANUARY 17, 2020 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated November 11, 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:	Mr. Neil Taratuta, Plant Manager 989-736-6618
AQD Contact:	Mr. William Rogers, Environmental Quality Analyst 989-705-3406

Summary of Pertinent Comments

The USEPA commented questioning how the facility would demonstrate compliance in a practically enforceable manner with its 24-hour fuel consumption limits on particle board and plywood, creosote treated wood, pentachlorophenol treated wood, and tire derived fuel (TDF). In response to this comment, Viking Energy of Lincoln has revised their Fuel Handling Plan. The revised plan clarifies that TDF feeds into the furnace over its own conveyor and is weighed as it is conveyed. The various alternate wood-based fuels will be mixed into the daily fuel feed in quantities less than the 24-hour limit for these fuels. Information on TDF and alternate wood fuels will be recorded in a manner acceptable to the AQD, as was already required by Permit Condition VI.19 of the EUBOILER table of the Renewable Operating Permit.

The USEPA commented recommending that the AQD should continue making the various off permit plans available to the public after the permit is finalized. These plans include plans for Preventive Maintenance and Malfunction Abatement, Fugitive Dust Control, Compliance Assurance Monitoring, Fuel Procurement and Handling. The AQD agrees.

Changes to the November 11, 2019 Draft ROP

No changes were made to the draft ROP.