

State Registration Number

N1192

RENEWABLE OPERATING PERMIT

JUNE 15, 2023 - STAFF REPORT ADDENDUM

ROP Number

MI-ROP-N1192-20XX

Purpose

A Staff Report dated May 8, 2023, 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:	Shuichi Kamakura, President 269-565-8636
AQD Contact:	Rachel Benaway, Environmental Quality Analyst 269-270-3170

Summary of Pertinent Comments

The Air Permits Section of USEPA Region 5 submitted a comment requesting a revision to the permit. The permittee is required to maintain a Malfunction Abatement Plan (MAP) for thirteen EUs to ensure satisfactory operation of each unit and any associated control equipment. The USEPA requested the inclusion of a condition in the ROP for recordkeeping requirements for MAP-related records to determine ongoing compliance with the MAP.

Based upon a second comment submitted by the USEPA, a request was made for the permittee to update their MAP to address the retention of records for daily visual pressure drop readings from the dust collector systems to ensure ongoing compliance with the MAP and consistent with 40 CFR 70.6(a)(3)(i)(B) and Michigan Air Pollution Control Rule 336.1213(3)(a)(ii).

Changes to the May 8, 2023 Draft ROP

A condition was added to the following EUs with a MAP requirement: EU-HTR1, EU-HTR2, EU-CONDMF3, EU-CONDMF41, EU-CONDGIC2, EU-EVAP1, EU-EVAP2, EU-EVAP4, EU-EVAPCS2, EU-EVAPSP4, EU-RDR1, EU-RDR2, and EU-RDR3. The new condition requires the permittee to keep records of monitoring and maintenance conducted to demonstrate the EU and all control devices are operated according to the approved MAP and to retain records on file, available to the department upon request.