

State Registration Number  
N1604

## RENEWABLE OPERATING PERMIT

ROP Number  
MI-ROP-N1604-20XX

March 27, 2018 - STAFF REPORT ADDENDUM

### Purpose

A Staff Report dated February 5, 2018, 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:	Darwin Baas, Director, Kent County Department of Public Works, 616-632-7979
AQD Contact:	April Lazzaro, Senior Environmental Quality Analyst 616-558-1092

### Summary of Pertinent Comments/Changes Made to ROP

No comments were received from the public. Comments were received from USEPA and changes were made to the February 5, 2018 draft ROP as follows:

EPA Comment 1: Please clarify in the Staff Report the applicability of 40 CFR Part 60, Subpart Cb and 40 CFR Part 62, Subpart FFF to this source.

AQD Response: 40 CFR Part 60, Subpart Cb is not applicable to this source, therefore, all such references have been removed. 40 CFR Part 60, Subpart FFF applies until such time where Michigan Rule 932 is enacted into law.

EPA Comment 2: FG-COMBUSTORS: Please verify the underlying applicable requirements for the streamlined particulate matter (PM), cadmium, mercury, and lead limits.

AQD Response: The streamlined limits for particulate matter (PM), cadmium, mercury and lead have been clarified and changed to reflect that the federal plan, 40 CFR Part 62, Subpart FFF is being subsumed.

EPA Comment 3: EU-ASHSYSTEM and FG-COMBUSTORS- please verify that the emission limits, testing requirements, and monitoring requirements originating from 40 CFR Part 60, Subpart FFF cite the correct underlying applicable requirements.

AQD Response: Where applicable, underlying applicable requirements origins were corrected.

EPA Comment 4: FG-COMBUSTORS: Various testing/sampling and monitoring conditions in the permit state that they are being used for compliance with emission limits from 40 CFR Part 60, Subpart Eb. Though the testing and monitoring requirements from 40 CFR Part 60, Subpart Eb are incorporated by reference by 40 CFR Part 62, Subpart FFF and therefore apply to the source, the emission limits from the 40 CFR Part 60, Subpart Eb do not. Please revise these conditions as necessary to ensure that they refer to the correct applicable emission limit.

AQD Response: All references to 40 CFR Part 60, Subpart Eb have been removed from the permit.

EPA Comment 5: 40 CFR Part 60, Subpart Db applicability for FG-COMBUSTORS: Page 5 of the Staff Report states that this source is not subject to the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units. However, SC II.2 and II.3 for FG-COMBUSTORS cite the NSPS as an underlying applicable requirement. Please verify the applicability of 40 CFR Part 60, Subpart Db to this source and revise the permit as necessary to list the appropriate underlying applicable requirements in accordance with 40 CFR 70.6(a)(1). This also applies to SC VI.42 and SC IX.2 for FG-COMBUSTORS.

AQD Response: 40 CFR Part 60, Subpart Db is not applicable to this source. As such it has been removed from the permit.

EPA Comment 6: CAM applicability for NO<sub>x</sub> limits for FG-COMBUSTORS: According to page 6 of the Staff Report, EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) are not subject to Compliance Assurance Monitoring (CAM) because the control device is not needed to meet the pounds per hour oxides of nitrogen (NO<sub>x</sub>) limits. However, these emission units are also subject to concentration NO<sub>x</sub> limits. Please verify CAM applicability for these concentration limits, in accordance with 40 CFR 64.2(a), and include CAM requirements in the permit as applicable.

AQD Response: FG-COMBUSTORS are not subject to CAM for NO<sub>x</sub> concentration limits because the control device is not needed to meet the emission limits. This has been clarified in the staff report.

EPA Comment 7: CAM applicability for SO<sub>2</sub> limits for FG-COMBUSTORS: The current applicability analysis in the Staff Report states that SO<sub>2</sub> limits derived from New Source Review are exempt from CAM because the FG-COMBUSTORS is subject to an NSPS. However, FG-COMBUSTORS is not subject to an NSPS. Please verify CAM applicability for the various SO<sub>2</sub> limits established during New Source Review in accordance with 40 CFR 64.2 and include the CAM requirements in the permit as applicable.

AQD Response: FG-COMBUSTORS are not subject to CAM for SO<sub>2</sub> concentration emission limits because the control device is not needed to meet the emission limits. This has been clarified in the staff report.

EPA Comment 8: EU-ASHSYSTEM, SC I.1: This limit originates from 40 CFR 62.14106(a) which lists the required observation period as 9 minutes per 3-hour period. In order to ensure the practical enforceability of this permit condition, please revise the condition to include the specific observation period.

AQD Response: The specific observation period has been added to the permit as requested.

EPA Comment 9: FG-COMBUSTORS, SC I.24: This pounds per hour HCl limit has a footnote 2 designation, but page 6 of the Staff Report indicates that this limit is not federally enforceable. Please review this limit to verify whether the "footnote 1" state enforceable-only designation or the "footnote 2" designation is correct, and revise the permit as appropriate. See R 336.1214a(3).

AQD Response: The "footnote 1" designation is correct, and the permit was changed to reflect that.

EPA Comment 10: Staff Report, page 8: The Staff Report states that SC II.5 and SC III.6 for FG-COMBUSTORS are being streamlined, but there does not appear to be a subsumed requirement. Please clarify whether or not these conditions are being streamlined.

AQD Response: SC II.5 and III.6 for FG-COMBUSTORS do not have a subsumed requirement, therefore, the streamlining has been removed.