

State Registration Number

N1722

RENEWABLE OPERATING PERMIT

JUNE 08, 2022 - STAFF REPORT ADDENDUM

ROP Number

MI-ROP-N1722-20XX

Purpose

A Staff Report dated April 18, 2022, 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:	Shawn Johnston, General Manager 231-942-1640
AQD Contact:	Kurt Childs, Senior Environmental Quality Analyst 231-878-2045

Summary of Pertinent Comments

Comments were received from the USEPA regarding Special Condition IV.1 of EU-WOODBOILER. Specifically, the US EPA commented:

"In Conditions IV(1) of EU-WOODBOILER, it states that the emission unit will not operate unless the multiple cyclone pre-cleaner and electrostatic precipitator are installed, maintained, and operated in a satisfactory manner. However, there is no further detail as to determine satisfactory operating conditions within the permit. In order to assure practical enforceability of the PM limits established for the emission unit, we recommend that additional language be added to provide clarity and specificity to the operating conditions that determine satisfactory manner."

Changes to the April 18, 2022 Draft ROP

In response to the US EPA comments, Special Conditions IV.2 and V.2 were added to clarify that a "satisfactory manner" means operating in accordance with specific control device operating parameters established during stack testing and identified in the MAP.

An additional testing requirement was added in SC V.2 of EU-WOODBOILER to require PM and PM10 testing since the limits are greater than the applicable significance levels for each pollutant and to establish acceptable control device operating ranges.

The comments affected existing Special Conditions that originated in PTIs. Current AQD policy does not allow alteration of such Special Conditions. Therefore, it was necessary to add new Special Conditions in order to address these comments.