

State Registration Number
N5619

RENEWABLE OPERATING PERMIT
May 18, 2022 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-N5619-2020b

Purpose

A Staff Report dated March 28, 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:	Gary Pitsch, Vice President, 616-363-4895
AQD Contact:	Dave Morgan, Environmental Quality Specialist 616-824-1139

Summary of Pertinent Comments

The following comments were received by U.S.EPA during the 30-day public comment period:

1. Appendix 5, Tier 4, Section (A): We recommend adding "at least" before 6,570 hours. This makes the incorporated language more consistent with 40 CFR 62.16718(a)(6)(viii)(A).
2. Appendix 7, equation 1: The index of summation included in the argument of the exponential function should be included as a subscript (e.g., $e^{-(kt_i)}$).
3. Appendix 7, Tier 2: The final paragraph of the section incorporates 40 CFR 62.16718(a)(3)(iv)(A) and (B) but does not include the option to conduct a SEM demonstration using the tier 4 procedures as allowed in 40 CFR 62.16718(a)(3)(iv)(C). We recommend including the option to conduct a SEM demonstration using the tier 4 procedures.
4. Appendix 7, tier 3: The first paragraph of this section refers to the tier 4 procedures as included in Appendix 5 of the draft permit instead of 40 CFR Part 62 Subpart OOO. We recommend citing 40 CFR 62.16718(a)(6) within this section of the appendix for further consistency with the Federal plan.
5. Appendix 7, "Calculating expected gas generation flow rates from the landfill": The first paragraph of this section states that USEPA Region V may approve site-specific factors. While this may be true in practice, we recommend referring to the Administrator for consistency with both the Federal plan requirements at 40 CFR 62.16720(a)(1) and the other references to the Administrator already proposed within the draft permit.
6. Appendix 7, Equations 5 and 6: Equations 5 and 6 appear to be missing from the draft permit. We recommend adding the equations to the permit.

Changes to the March 28, 2022 Draft ROP

All changes proposed by U.S.EPA during the 30-day comment period were made to the draft ROP.