

State Registration Number
N5814

RENEWABLE OPERATING PERMIT
May 10, 2021 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-N5814-20XX

Purpose

A Staff Report dated March 29, 2021, 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:	Mark Conti, General Manager 517-279-1090
AQD Contact:	Amanda Chapel, Senior Environmental Quality Analyst 269-910-2109

Summary of Pertinent Comments

EPA Comments:

EPA Comment 1:

Throughout the permit there are various requirements in the process and operational restrictions permit conditions between the different baghouses. For some of the EUs, the permit condition for baghouse maintenance varies greatly on what the practical enforceability is from a simple “operate properly” to a full out requirement to comply with an O&M plan, with baghouse pressure drop readings and BLDS. Language applying the practices from the O&M plan should be included in all the baghouse references.

AQD Response 1:

The terms “satisfactory manner” and “operating properly” come straight from PTI # 139-96 and 139-96A and was considered to be boilerplate NSR language at the time of permit issuance. District staff did not alter the ROP language from the original PTI in any manner. Periodic monitoring language was added to require periodic emission testing and daily visible observations to support the PM emission and opacity limit. The baghouses in the George Fischer foundry are now equipped with bag leak detection but this was not required by a PTI.

The terms “in accordance with an approved operation and maintenance plan” come straight from PTI # 280-06, 280-06A, and 280-06B and was considered to be updated boilerplate NSR language at the time of permit issuance ten years later. District staff did not alter the ROP language from the original PTI in any manner.

To address EPA’s concern, additional periodic monitoring will be added under the affected emission units (EU-GFMELTPOUR, EU-GFSANDSYS, and EU-SHOTBLAST) with language specifying that the baghouses shall be installed, operated, and maintained in accordance with an approved operation and maintenance (O&M) plan. The UAR for this condition will be R 336.1213(3) only as it is being added as periodic monitoring.

EPA Comment 2:

EU-DSCOOOLSHOT: One page 33 of the draft ROP for EU-DSCOOOLSHOT, the PM10 emissions limit has an underlying applicable requirement (UAR) of 40 CFR 52.21(j) only. As this is a BACT limit, you should also include the applicable rule from Michigan's Part 18 Rule as a UAR.

AQD Response 2:

The UAR R 336.2810 has been added to this condition. Based on a review of the DISA foundry conditions, this was also added to the EU-DSMOLDSAND, EU-DSCOOOLSHAK, and EU-DSMELTPOUR emissions units.

Changes to the March 29, 2021 Draft ROP

EU-GFMELTPOUR: On page 16 "The permittee shall not operate EU-GFMELTPOUR unless the associated capture system and baghouse control system are installed, operated and maintained in accordance with the approved operation and maintenance (O&M) plan. **(R 338.1213(3))**" was added under III. Process/Operational Restrictions.

EU-GFSANDSYS: On page 19 "The permittee shall not operate EU-GFSANDSYS unless the associated capture system and baghouse control system are installed, operated and maintained in accordance with the approved operation and maintenance (O&M) plan. **(R 338.1213(3))**" was added under III. Process/Operational Restrictions.

EU-SHOTBLAST: On page 22 "The permittee shall not operate EU-SHOTBLAST unless the associated capture system and baghouse control system are installed, operated and maintained in accordance with the approved operation and maintenance (O&M) plan. **(R 338.1213(3))**" was added under III. Process/Operational Restrictions.

EU-DSMELTPOUR: On page 24 the UAR R 336.2810 was added under I.2 Emissions limits for PM10 under the Underlying Applicable Requirements column.

EU-DSCOOOLSHAK: On page 27 the UAR R 336.2810 was added under I.2 Emissions limits for PM10 under the Underlying Applicable Requirements column.

EU-DSMOLDSAND: On page 30 the UAR R 336.2810 was added under I.1 Emissions limits for PM10 under the Underlying Applicable Requirements column.

EU-DSCOOOLSHOT: On page 33 the UAR R 336.2810 was added under I.1 Emissions limits for PM10 under the Underlying Applicable Requirements column.