

State Registration Number

N6004

**RENEWABLE OPERATING PERMIT**

ROP Number

MI-ROP-N6004-20XX

**DECEMBER 6, 2018 - STAFF REPORT  
ADDENDUM**

**Purpose**

A Staff Report dated October 8, 2018, 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:	Scott O'Laughlin, Landfill Superintendent 989-839-6989
AQD Contact:	Gina McCann, Senior Environmental Quality Analyst 989-439-2282

**Changes to the October 8, 2018 Draft ROP**

No comments were received from the public. Comments were received from USEPA and changes were made to the October 8, 2018, draft ROP as follows:

**EPA Comment 1:**

Staff Report, Regulatory Analysis. Please clarify and correct the source's major source status with respect to aggregate and individual hazardous air pollutants (HAPs). The third paragraph states that the source is major for both aggregate and individual HAPs, the seventh paragraph generally states that HAPs are below the major source thresholds, and the twelfth paragraph states that formaldehyde emissions are major.

**AQD Response:**

City of Midland Utilities Division is a major source of HAPs. The potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, formaldehyde, is equal to or more than 10 tons per year.

**EPA Comment 2:**

Staff Report, Source-Wide Permit to Install and Appendix 6, Permits to Install. Together, the Permit to Install table in the Staff Report and Appendix 6 of the Renewable Operating Permit address the source's construction permit history and document the Permit to Install underlying applicable requirement origin and authority, as required by 40 CFR §70.6(a)(1)(i). It appears that some permit to install actions are not included, even though they were documented in the previous Renewable Operating Permit. Please review the source's permitting record and identify the Permits to Install in the Staff Report or Appendix 6, in accordance with MDEQ's Renewable Operating Permit Manual.

AQD Response:

Permit to Install (PTI) 45-10B should be included in the Source-Wide PTI table in Appendix 6. The facility once had two separate SRNs. PTI 45-10B was issued under SRN P0072. The facility made a stationary source demonstration and was combined under SRN N6004.

PTI 179-11 should not be in the Source-Wide PTI table. This permit was issued for a used oil burner and the equipment has since been replaced and new equipment installed under PTI 179-17, which is identified in Appendix 6 of the Renewable Operating Permit.

EPA Comment 3:

EU-FURNACE. This section of the permit includes conditions established pursuant to Permit to Install # 179-17. Please review all conditions in EU-FURNACE and include the Footnote 1 and Footnote 2 designations, as appropriate, to each condition that is enforceable pursuant to Title I of the Clean Air Act, Michigan Rules 201(1)(a) or (b), and the state procedures for identifying the Source-wide Permit to Install.

AQD Response:

Conditions in EU-FURNACE were reviewed and Footnote 1 and Footnote 2 designations were appropriately added to each condition where applicable.

EPA Comment 4:

EU-FURNACE. In accordance with the monitoring requirements in 40 CFR §70.6(a)(3) and (c)(1), please either 1) supplement the monitoring and recordkeeping (including data collection frequency, data averaging, and calculations) in the permit to assure compliance with the 0.17 pound per hour SO<sub>2</sub> limit or 2) provide justification in the Staff Report verifying that the existing monitoring in VI.2 is sufficient to assure compliance with the hourly SO<sub>2</sub> limit.

AQD Response:

The material limit specified in special condition II.4 limits the sulfur content of all fuels used in EU-FURNACE to not exceed 1.0 percent by weight. This material limit restricts the sulfur thereby limiting the SO<sub>2</sub> content to below 0.17 pounds per hour.

Additional testing language was added to verify compliance with the 0.17 SO<sub>2</sub> limit if the 1.0 percent by weight sulfur content of the fuel cannot be met.

EPA Comment 5:

EU-FURNACE. Section VI. includes a requirement for noncertified visible emissions readings. Typically, noncertified readings are only used to detect the presence or absence of visible emissions, and they typically require subsequent certified readings and/or corrective action for units that do not normally have any detectible visible emissions. In contrast, EU-FURNACE is a used oil furnace subject to a six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity. In accordance with 40 CFR §70.6(a)(3) and (c)(1), please either 1) supplement the monitoring and recordkeeping in the permit as necessary to assure compliance with the opacity limits, or 2) provide justification in the Staff Report verifying how the existing permit conditions are sufficient to assure compliance.

AQD Response:

Additional conditions were added under VI. Monitoring/Recordkeeping to supplement the monitoring and recordkeeping in the permit to assure compliance with the opacity limits.

EPA Comment 6:

EU-FURNACE. Please correct each of the four references to Appendix A in EU-FURNACE to Appendix 3, pertaining to used oil compliance monitoring.

AQD Response:

As recommended, each of the four references to Appendix A in EU-FURNACE were changed to reference Appendix 3, pertaining to used oil compliance monitoring.

EPA Comment 7:

FGICENGINES. This section of the permit includes conditions established pursuant to Permits to Install #45-10, #45-10A, and #45-10B. Please review all conditions in FGICENGINES and include the Footnote 1 and Footnote 2 designations, as appropriate, to each condition that is enforceable pursuant to Title I of the Clean Air Act, Michigan Rules 201(1)(a) or (b), and the state procedures for identifying the Source-wide Permit to Install.

AQD Response:

Conditions in FGICENGINES were reviewed and Footnote 1 and Footnote 2 designations were appropriately added to each condition where applicable.

EPA Comment 8:

FGICENGINES. Section III.2. is missing the identification of the underlying applicable requirement(s). In accordance with 40 CFR §70.6(a)(1)(i), please add the underlying origin and authority for these permit conditions.

AQD Response:

As recommended, the underlying applicable requirements in Section III.2 of FGICENGINES were added. A formatting issue had pushed the underlying applicable requirements into an additional condition. The added underlying applicable requirements were derived from PTI 45-10B.

EPA Comment 9:

Plans referenced in the permit. Several conditions in the permit refer to requirements to develop and operate in accordance with specific plans. Please ensure that these plans are readily accessible in the permit record, including online Internet availability if feasible. As addressed by EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program," information cited or cross-referenced in permits should be current and readily available to the permitting agency and to the public. The referenced plans include: surface monitoring design plan (EU-LANDFILL), startup, shutdown, malfunction plans (EU-ACTIVECOLL, EU-OPENFLARE), preventative maintenance plan (EU-TREATMENTSYS), and malfunction abatement/preventative maintenance plan (FGICENGINES).

AQD Response:

The referenced plans are a part of the ROP Renewal Application and available online, as well as listed individually.

Additional Changes:

A citation error was discovered under EUBIOREACTOR, special condition VI.2. The condition referenced Table 1 of 40 CFR Part 60, Subpart AAAA. The referenced table is actually in 40 CFR Part 63, Subpart AAAA. Part 60 was changed to Part 63.