

State Registration Number  
N6034

## RENEWABLE OPERATING PERMIT

ROP Number  
MI-ROP-N6034-20XX

**JULY 16, 2018 - STAFF REPORT ADDENDUM**

### Purpose

A Staff Report dated May 7, 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:	David J. Brisson, President 906-774-9006
AQD Contact:	Joseph Scanlan, Environmental Quality Analyst 906-250-5123

### 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 May 7, 2018, draft ROP as follows:

EPA Comment 1: Because this source has not received any Permits to Install (PTIs), the draft initial ROP correspondingly does not include a source-wide PTI (see Michigan Rule 214a). However, the draft ROP includes several references to a source-wide PTI. Please review the following and revise the permit and Staff Report as necessary to clarify that the ROP does not include a source-wide PTI:

- PTI identification number on the header of each page
- PTI general conditions on page 10
- Rule 201 footnote references on pages 10, 16, 20, and 27
- Standard source-wide PTI language on page 8 of the Staff Report

AQD Response: As recommended by USEPA all references to a source-wide Permit to Install (PTI) have been removed from the ROP.

EPA Comment 2: Please verify whether this source is subject to 40 CFR Part 63, Subpart AAAA, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste Landfills, and include the applicable NESHAP requirements in the permit as necessary.

AQD Response: Under EU-LANDFILL<34, a high-level citation to 40 CFR Part 63, Subpart AAAA, was added in section IX.2.

EPA Comment 3: The emission table for EU-WOOD BOILER includes requirements pursuant to 40 CFR Part 63, Subpart JJJJJJ, NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources, for both biennial tune-ups and 5-year tune-ups. To clarify that the seasonal boiler is subject to the 5-year requirements, please review Section III.5 and Section III.6 and consider including only the 5-year tune-up provisions. For example, one approach could be to 1) delete Section III.5 and 2) include the specific applicable provisions of 40 CFR 63.11223(b)(1) through (7) under Section III.6 of the permit.

AQD Response: Under EU-WOOD BOILER, the original section III.5 was deleted and the original section III.6 was re-numbered to existing III.5.

EPA Comment 4: Section E, Non-Applicable Requirements, includes a table that generally refers to the Flexible Group representing the general landfill. In order to meet the requirements of 40 CFR 70.6(f)(1)(ii), a non-applicability permit shield should specify the non-applicable requirements and also include a determination regarding why the requirements are not applicable. Please provide additional documentation as necessary in Section E. for any non-applicability permit shield determinations.

AQD Response: The contents of the table in Section E, Non-Applicable Requirements, were inserted in error and have been deleted.