

EXAMPLE ONLY
USE: WORD/FILE/NEW/ROP PN FACT SHEET FOR PUBLIC HEARING

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION

INFORMATION ABOUT THE
PROPOSED DRAFT RENEWABLE OPERATING PERMIT FOR
S.D. WARREN COMPANY
2400 Lakeshore Drive
Muskegon, Michigan

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) is holding a public hearing on a proposed draft Renewable Operating Permit for the S.D. Warren Company, in the Muskegon Center for Higher Education, Room 1100, 221 South Quarterline Road, Muskegon, Michigan, on November 14, 2001, at 7:00 pm. A public comment period on the draft Renewable Operating Permit was held from October 8, 2001 through November 6, 2001. The purpose of this document is to provide general information about the Renewable Operating Permit process and the draft permit.

What is the Renewable Operating Permit Program?

- The Renewable Operating Permit program is a national permitting system, administered by each state. It is required by the Federal Clean Air Act amendments of 1990.
- The goal is to ensure that source operators know what air pollution control requirements apply to them. The public will also be better informed about what is required of major sources of pollution in their neighborhoods.
- Each "major source" is subject to the program. A "major source" is a facility that is capable of emitting more than certain amounts of air contaminants.
- A facility subject to the Renewable Operating Permit program must submit a complete application to EGLE, AQD.
- The program clarifies regulations at a facility by including all of the requirements dealing with air emissions into one permit.
- The permit does not impose any new emission limits or standards.
- The permit requires that evaluation activities, including testing, monitoring, recordkeeping, and reporting, be conducted at a facility to assure compliance.
- The permit requires that any deviations from the permit requirements be formally reported at least twice a year. A designated "responsible official" must certify that all of the information in each report is true, accurate, and complete.
- EGLE, AQD approves the Renewable Operating Permit according to rules adopted by the State of Michigan.
- The Renewable Operating Permit is issued for 5 years and then must be renewed.
- Facilities with Renewable Operating Permits are required to pay annual emission fees to the State of Michigan.

What is the Process for Issuing a Renewable Operating Permit?

- After receipt of a complete application, EGLE, AQD district staff prepare a draft permit and a staff report that identifies the applicable requirements and factual basis for the draft permit terms and conditions.
- The applicant is allowed to review and comment on the draft permit prior to public participation.
- A public notice is published in an area newspaper or in a state publication designed to give general public notice. The public notice shall provide not less than 30 days for public comment and shall give notice of any public hearing not less than 30 days in advance of the hearing.

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- A public comment period, and a public hearing when requested, are held for the draft Renewable Operating Permit.
- EGLE, AQD district office keeps a record of the comments and the issues raised during the public participation process.
- EGLE, AQD staff reviews the comments made during the public participation process and prepares a proposed Renewable Operating Permit.
- If substantial changes are made to the proposed Renewable Operating Permit, the applicant is allowed to review and comment on the changes.
- A copy of the complete application, the staff report, and the proposed Renewable Operating Permit are transmitted to the United States Environmental Protection Agency (US EPA) for review. The review period lasts 45 days.
- If the US EPA objects, in writing, to the renewable operating permit before the end of the 45-day review period, the Renewable Operating Permit shall not be issued until the objection has been resolved.
- The final decision to issue or deny a Renewable Operating Permit is made by EGLE, AQD decision-maker.
- A person aggrieved by the final decision may appeal the decision. Also, any person may petition the US EPA to make an objection regarding a Renewable Operating Permit. The petition must be filed within 60 days after the expiration of the 45-day review period.

Who is the Decision-Maker on the S.D. Warren ROP?

- Heidi Hollenbach, Grand Rapids District Supervisor, AQD, EGLE.

What are the Requirements of the Draft Renewable Operating Permit for S.D. Warren Company?

- S.D. Warren Company currently has several air use permits called “Permits to Install”. These permits:
 - Limit emissions for 7 air contaminants and opacity (smoke).
 - Require continuous monitoring of emissions for three air contaminants and opacity.
 - Require stack testing to verify emission rates of several air contaminants.
 - Require quarterly reporting of data determined by the continuous emissions monitors.
 - Identify what materials can or cannot be used as fuels.
 - Require records of fuel use.
 - Require the proper use of many pollution control devices.
 - Require stacks with minimum height requirements.
- S.D. Warren Company is preparing to enter a Consent Order (currently in the public comment period.) The purpose of the order is to help assure compliance with the emission limits of their permits and to control fugitive dust and odors.
- Because S.D. Warren Company is a “Major Source”, it is subject to the Renewable Operating Permit program. The draft Renewable Operating Permit contains the following:
 - All of the requirements of the Permits to Install and the Consent Order.
 - Many “general requirements” included in state and federal air pollution laws.
 - Many federal requirements by which the facility’s processes are regulated.
 - Formalized emission limits and monitoring required per federal guidance for sources (such as S.D. Warren) not subject to federal Standards of Performance for New Sources.
 - Additional requirements for stack testing of emissions.
 - Additional requirements for process monitoring.
 - Implementation of various malfunction abatement plans.
 - Implementation of a continuous program for control of dust on the plant grounds.

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- Additional requirements for both the periodic and the prompt reporting of excessive emissions.
- Semi-annual certifications, made by the responsible official, regarding compliance with respect to each requirement within the permit.

What are the Annual Emissions Reported by S.D. Warren Company?

| Pollutant | Tons/Year |
|---------------------------------|-----------|
| Carbon Monoxide | 1,477 |
| Lead | 0.04 |
| Oxides of Nitrogen | 2,068 |
| Oxides of Sulfur | 1,599 |
| Particulate Matter | 241 |
| Particulate Matter < 10 Microns | 221 |
| Volatile Organic Compounds | 173 |

(These values are based on the facility's 2000 data submitted to Michigan Air Emissions Reporting System.)

Is S.D. Warren Company in Compliance?

- EGLE, AQD district staff routinely inspect the facility, review stack test reports, investigate complaints by neighbors, and review emission reports and records submitted by the company.
- The proposed Consent Order formally resolves past violations while providing a basis for stipulated penalties for future violations.
- Based on information obtained by EGLE, AQD, the facility is currently in compliance with applicable air use rules and regulations.

For More Information Contact:

- Mr. Steve Lachance, 616-356-0239, EGLE, AQD, Grand Rapids District Office, 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503.