

State Registration Number  
N5056

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N5056-2021

**Magna Mirrors North America**

State Registration Number (SRN): N5056

Located at

700 South Industrial Drive, Newaygo, Newaygo County, Michigan 49337

Permit Number: MI-ROP-N5056-2021

Staff Report Date: July 5, 2021

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

## TABLE OF CONTENTS

<b>July 5, 2021 - STAFF REPORT</b>	<b>3</b>
<b>August 5, 2021 - STAFF REPORT ADDENDUM</b>	<b>13</b>

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**RENEWABLE OPERATING PERMIT**

ROP Number  
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**July 5, 2021 - STAFF REPORT**

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan's Administrative Rules for Air Pollution Control promulgated under Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	Magna Mirrors of America Newaygo Division 700 South Industrial Drive Newaygo, Michigan 49337
Source Registration Number (SRN):	N5056
North American Industry Classification System (NAICS) Code:	336390
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	202000149
Responsible Official:	Daniel Groszkiewicz, General Manager 231-652-8453
AQD Contact:	Kaitlyn DeVries, Senior Environmental Quality Analyst 616-558-0552
Date Application Received:	September 24, 2020
Date Application Was Administratively Complete:	September 24, 2020
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	July 5, 2021
Deadline for Public Comment:	August 4, 2021

## Source Description

Magna Mirrors Newaygo Division is a worldwide manufacturer of automotive parts, mainly mirrors. The Newaygo facility began operation in 1994 and produces plastic automobile mirrors and door handles. Magna Mirrors Newaygo Division is permitted to coat metal parts but based on previous inspections, has not done so for several years. Production equipment for the facility includes a conveyerized coating line with automated electrostatic spraying technology for coating of automotive plastic parts. The coating line consists of three (3) spray booths (base, clear and prime) and associated bake / cure ovens and connecting flash tunnels. Each of the three (3) spray booths utilize a downdraft water wash particulate control system.

Onsite operations at the Newaygo facility start with plastic injection molding used to produce plastic parts. Once this is done the parts go through various process operations before coating. Following coating, the parts are assembled before being shipped offsite. During coating operations, a prime coat is applied to the part in the prime booth. Emissions from the prime booth are controlled by a regenerative thermal oxidizer (RTO). Following the prime booth, parts go through a flash tunnel and cure oven. Once this is done, a base and clear coat are applied to the parts in the base and clear coat paint booths respectively. Emissions from the base and clear coat paint booths are controlled by a second RTO. Following the base and clear coat booths the parts go through a final cure oven. Air from the base and clear coat paint booths is recirculated in order for emissions to be more concentrated, thus allowing for more efficient destruction by the RTO and reduced use of supplemental fuel used to control the combustion zone temperature. Due to the potential safety issues and health risks associated with each paint booth, the use of manual HVLP applicators for coating materials is no longer done, and all applications utilize robotic electrostatic applicators.

Cleanup and purge emissions are included in EUCLEANUP/PURGE. Delivery of coatings from the paint kitchen is completed through a system of pneumatic hard piping. A variety of coatings are applied during operation with delivery lines and applicator systems needing to be flushed with solvent after each switch to a different material. This is done by first completing a process called "pigging." This is done when pig (foam plug) is inserted and pushed through the line via air pressure back to the paint container to remove unused paint that can later be used. Following this, the lines are flushed with a purge solvent which is pumped and collected back in the kitchen area. Reuse of solvent is achieved by the use of the dirtiest solvent first followed by "clean" solvent. Additionally, cleanup solvents are used for wipe down of booths, cleanup in the kitchen area, and the several paint line parts cleaners noted onsite.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2020**

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	1.995
Lead (Pb)	0.01 pounds
Nitrogen Oxides (NO <sub>x</sub> )	2.93
Particulate Matter (PM)	0.11
Sulfur Dioxide (SO <sub>2</sub> )	0.017
Volatile Organic Compounds (VOCs)	73.61

The following table lists Hazardous Air Pollutant emissions as calculated for the year based on records received from Magna Mirrors North America.

<b>Individual Hazardous Air Pollutants (HAPs) **</b>	<b>Tons per Year</b>
Formaldehyde	0.859
Methanol	0.047
Methyl Methacrylate	0.006
Naphthalene	0.022
Cumene	0.108
Ethylbenzene	0.259
MIBK	0.352
Toluene	0.313
Glycol Ethers	1.742
2-Butoxyethyl Acetate	0.077
Ethylene Glycol Monohexyl Ether	0.031
Diethylene Glycol Monobutyl Ether	0.063
Ethylene Glycol Phenyl Ether	0.001
Diethylene Glycol Butyl Ether Acetate	1.569
Xylene	1.254
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>4.962</b>

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

### **Regulatory Analysis**

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is in Newaygo County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of volatile organic compounds (VOCs) exceeds 100 tons per year.

The stationary source is a “synthetic minor” source of Hazardous Air Pollutants (HAPs) because the stationary source accepted a legally enforceable permit condition limiting the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act to less than 10 tons per year and the potential to emit of all HAPs combined to less than 25 tons per year.

The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of volatile organic compounds (VOCs) to less than 250 tons per year.

Magna Mirrors Newaygo was issued Permit to Install (PTI) No. 450-93 on June 14, 1994, for an automated wet coating line which consisted of a six-stage wash line, three down draft water wash paint spray booths, a prime coat cure oven, a final coat cure oven and a regenerative thermal oxidizer. The process had an 85.3 tons per year (tpy) VOC emission limit per a 12-month rolling time period and a 41.8 pounds per hour (pph) VOC emission limit. Additional VOC emission limits were permitted for processing of metal parts and use of cleanup / purge solvent materials.

An increase in the VOC emission limit for EUCLEANUP/PURGE was approved in PTI No. 450-93B on November 28, 2000, increasing the VOC emission limits to 11.25 pph and 22.5 tpy per a 12-month rolling time period. Magna Mirrors Newaygo may use EPA reference Method 24, or the Facility Mix Sheet (FMS) supported by the manufacturer's technical data sheet (MTDS) to determine the VOC pound per gallon and mass emission quantities. The MTDS is acceptable because it is batch specific and determined from a Method 24 analysis by the coating manufacturer. The MTDS contains actual coating density, non-volatile material content, resistivity, viscosity, and gloss. Each MTDS is developed from the respective coating material after it has been "created" and prior to being shipped to Magna Mirrors Newaygo. The Rule 632 footnotes, or modifiers as referenced in the 2006 ROP, were originally provided because of the known "excursions" in the Method 24 analysis on certain types of coatings that may be corrected by use of the modifiers. The modifiers were considered acceptable and copies of MTDS's and Method 24 analysis performed will be made available upon inspection. Material Safety Data Sheets would not be considered acceptable when determining the VOC content of a coating material and used to calculate emissions data. Paint VOC information on an FMS is developed from the MTDS information. An FMS will contain the mix of paint, thinner, and catalyst as sprayed for each coating, as well as the computed VOC content.

Facility wide individual and aggregate HAP opt-out limits of less than 10.0 tpy and less than 25.0 tpy, respectively, were approved in PTI No. 450-93C on December 18, 2006.

A request was made and approved in PTI No. 450-93D, on February 26, 2007, to apply paints to plastic and metal automotive parts. Additionally, several emission and material limits were added for the coating line.

A request for an increase in the VOC emission limit to 130 tpy for the paint application line was approved per PTI No. 450-93E on April 15, 2010. Additional emission limits were added and the maximum melamine resin contents for materials used in the coating line were increased. During the permitting process, the coating line and purge / cleanup processes were reviewed for Best Available Control Technology (BACT). It was determined that in order to meet BACT, coating applicators are to use automatic electrostatic reciprocating applicators and automatic robots with electrostatic and high-volume low pressure (HVLP) applicators, or equivalent technology with comparable coating transfer efficiency. In order to assure compliance with the air toxics screening levels of Rule 225 related to formaldehyde, dibasic esters, cumene, and ethyl benzene, emission limits and other restrictions were needed. Based on the air toxics review, it was concluded that predicted ambient impacts will meet all applicable air toxics screening levels in compliance with the requirements of Rule 225 provided that the emission limits and other permit restrictions added to limit TAC emissions are met.

Increases to the maximum melamine resin content and several emission limits were approved in PTI No. 450-93F, on October 7, 2010.

A request to administratively combine toxic emission limits for dibasic ester, and cumene, and eliminate the limit for ethylbenzene due to all three (3) booths now being controlled by one of two regenerative thermal oxidizers was made and approved in PTI No. 450-93G, dated May 18, 2011. With the addition of RTO-2, the Rule 632 limits were removed from the ROP.

In 2019, Magna Mirrors Newaygo installed a Cummins QSL9-G7 464 horsepower (4.926 MMBTU/hr) emergency generator. The emergency generator utilizes #2 diesel fuel and falls under EPA Tier 3 exhaust emission compliance. The emergency generator was installed under the Michigan Rules 282(2)(b)(ii) exemption. The emergency generator is subject to the New Source Performance Standards (NSPS), Subpart IIII for Stationary Compression Ignition Internal Combustion Engines. This emission unit is also subject to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP), Subpart ZZZZ for area sources. Compliance with 40 CFR Part 63, Subpart ZZZZ is demonstrated through compliance with 40 CFR Part 60, Subpart IIII.

Several changes were requested by Magna Mirrors Newaygo and are discussed further below.

- The first proposed change is adding the flexible group (FGRICE) that contains the emergency generator (EUGENERATOR) and applicable permit conditions. This is for the 4.926 MMBTU/hr emergency generator that was installed in 2019 with additional specifics previously mentioned above. Since there was only one emission unit (EUGENERATOR), the flexible group was renamed as an emission unit table. In order to maintain consistency, all applicable permit conditions and the description for EUGENERATOR were updated accordingly.
- The second proposed change by the company is to remove language in the existing ROP that mentions high volume low pressure (HVLP) applicators due to the facility having removed the use of hand-held HVLP applicators from the prime booth due to both safety and health risks. The conditions that contain the HVLP language were from previous permitted conditions, therefore, a PTI application would have to be submitted to modify the conditions and potentially remove the language. However, the wording of the special conditions does allow for Magna Mirrors Newaygo to cease using HVLP spray applicators as long as they are replaced with a comparable technology. Additionally, test caps would no longer be required to be kept onsite if HVLP spray technology is not being used. Based on this and after speaking with Magna Mirrors Newaygo staff, the proposed ROP changes are not necessary and were not made.
- The third proposed change is for EUWETCOAT. The company proposed that a test plan be submitted to the AQD no less than 30 days prior to testing instead of 120 days when determining the destruction efficiency of both RTOs. This condition (Special Condition V.3) does not appear to have been from a previous permit. In order to maintain consistency with similar testing conditions this proposed change is considered acceptable.
- The fourth proposed change was to rename one stack (SV-BAS/CLROXIDIZER) that is associated with EUWETCOAT and EUCLEANUP/PURGE to SV-RTO-01. This change was acceptable.
- The fifth proposed change was to update Appendix 6 and Appendix 8. Each appendix was updated as necessary.

Changes were made during the technical review of the ROP with additional information regarding each change discussed further below.

- Several pollutants for EUWETCOAT listed “Test Protocol” as the Time Period / Operating Scenario. Based on guidance from EPA, the “Test Protocol” has been replaced with a more enforceable condition. For pollutants with a pound per hour (pph) limit, the “Test Protocol” was replaced with “Pound per hour.” For pollutants with a percent by weight limit, the “Test Protocol” was replaced with “Instantaneous.”
- In the ROP renewal application it was determined that no emission units onsite utilize the Rule 290 or Rule 287(2)(c) exemption. This was verified during the November 13, 2020 records request. Rule 290 and Rule 287(2)(c) tables were removed from the ROP.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

The following Emission Units/Flexible Groups are subject to CAM:

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM *
EUWETCOAT	VOC/ 130.0 tons per year	R 336.1205, R 336.1225, R 336.1702(a)	RTO No. 1 and RTO No. 2	RTO combustion chamber	FGCAMPLAN	No

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM *
	VOC and Acetone combined /5.2 pounds per hour	R 336.1702(a), R 336.1910		<p>temperature – Greater than 1,400°F.</p> <p>Semiannual and annual inspections of the RTO and its components</p> <p>Air flow direction verification via smoke tube testing and monitoring of the fan motor frequency to demonstrate the solvent vapor retention in the system</p>		
EUCLEANUP/ PURGE	<p>VOC/ 11.25 pounds per hour</p> <p>VOC/ 22.5 tons per year</p>	<p>R 336.1205, R 336.1225, R 336.1702(a)</p> <p>R 336.1205, R 336.1225, R 336.1702(a)</p>	RTO No. 1 and RTO No. 2	<p>RTO combustion chamber temperature – Greater than 1,400°F.</p> <p>Semiannual and annual inspections of the RTO and its components</p> <p>Air flow direction verification via smoke tube testing and monitoring of the fan motor frequency to demonstrate the solvent vapor retention in the system</p>	FGCAMPLAN	No

\*Presumptively Acceptable Monitoring (PAM)



The emission limitations (VOC in tpy and VOC and Acetone Combined in pph) for EUWETCOAT and the VOC emission limitations (pph and tpy) for EUCLEANUP/PURGE at the stationary source are subject to the federal Compliance Assurance Monitoring (CAM) rule pursuant to 40 CFR Part 64.

EUWETCOAT is an enclosed conveyerized coating line that includes a five (5) stage wash line, dry off oven, prime application booth, prime cure oven, base coat application booth, clear coat application booth, and final cure oven. The individual components of the line are connected by enclosed flash tunnels. The only non-enclosed area is the parts load / unload area, which begins after the final cure oven and ends at the start of the wash line. The line utilizes automatic robots with electrostatic applicators for coating application. The VOCs released and captured within the three paint application booths (prime, base, and clear) are directed to one of two RTOs (RTO No. 1 and RTO No. 2).

VOC emissions from the use of purge and cleanup solvents (EUCLEANUP/PURGE) in the paint kitchen, and paint recirculation lines are released uncontrolled within the paint kitchen. Purge solvents used in the paint booths for the robot delivery system are captured directly into a waste container and shipped to the paint/purge waste totes in the kitchen. Volatiles are released within each of the three (3) paint spray booths associated with this EUWETCOAT and are controlled by RTO No. 1 and RTO No. 2.

EUWETCOAT and EUCLEANUP/PURGE have control devices and have potential pre-control emissions of VOCs greater than the major source threshold levels. The factors impacting the destruction of VOCs include time, turbulence, and temperature. The retention time is a function of the size of the vessel and the design air flow rate. Since the size of the vessel does not change, simply maintaining the volumetric air flow at levels below the maximum design level ensures that the retention time will be at 0.5 seconds or more. Maintaining an operating temperature at or above the permitted threshold of 1,400°F, a 95% destruction efficiency can be expected, and is verified during testing.

The combustion temperature is monitored and recorded to verify proper operation of each RTO. The temperature data logger on each RTO collects temperature readings every 15 minutes, or more frequently, in equally spaced intervals. The most recent testing completed to demonstrate satisfactory destruction efficiency of at least 95 percent (by weight) across each RTO was performed on October 25, 2011, and November 9, 2011. Test results indicated a destruction efficiency of approximately 97 percent for each RTO by maintaining and operating the combustion chamber temperature above the permitted 1,400°F. During process operations, a minimum of 1,400°F RTO combustion temperature is selected as the indicator range which could demonstrate at least a 95% destruction efficiency. The minimum combustion chamber temperature demonstrating at least a 95% (by weight) destruction efficiency across each RTO shall be 1,400°F. Testing to verify the destruction efficiency for each RTO was required by June 16, 2021 and was performed on May 4, 2021.

The work practice standards are comprised of semiannual and annual inspections and maintenance for each RTO. The inspections verify equipment integrity and periodic maintenance will allow for proper burner operation and efficiency. Magna Mirrors North America shall complete all applicable inspections and maintenance as required by the most recently approved CAM Plan for each RTO.

The secondary control equipment is the solvent vapor retention system for each RTO. Currently, a smoke tube test is conducted a minimum of twice per shift in order to verify the air flow direction into each spray booth enclosure, demonstrating a negative differential pressure for each booth enclosure. In order to demonstrate compliance with the retention of the solvent, the fan motor frequency (Hz) will be monitored to assure that the fan is operating for each RTO. The company has proposed that the fan-motor frequency be connected to the lock-out system, whereby if the frequency is detected below the proposed operation range, the coating line conveyor will automatically be stopped, and the robotic applicators locked out until the fan-motor frequency returns to the proper operating range. This ensures that there is sufficient airflow drawing the solvent laden air into the RTOs. Thus, monitoring both the direction of the airflow and the frequency of the fan motor together will demonstrate compliance with the requirements of CAM for capture efficiency and solvent vapor retention.

The work practice standards comprised of monthly / annual inspections and maintenance of the capture system components. The inspections verify equipment integrity and periodic maintenance will allow for proper damper operation and efficiency. Magna Mirrors North America shall complete all applicable inspections and maintenance as required by the most recently approved CAM Plan for each capture system.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

**Source-Wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-Wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-N5056-2016 are identified in Appendix 6 of the ROP.

PTI Number			
450-93	450-93B	450-93C	450-93D
450-93E	450-93F	450-93G	

**Streamlined/Subsumed Requirements**

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

**Non-applicable Requirements**

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

**Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
Boiler #1 – Cleaver Brooks	4.184 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Boiler #2 – Donlee	6.100 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Air Handling Unit #1 – Hastings	2.200 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Air Handling Unit #2	2.200 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Air Handling Unit #3	0.500 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #1	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #2	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #3	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #4	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #5	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #6	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #7	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212(4) Citation</b>	<b>PTI Exemption Rule Citation</b>
Trane Unit #8	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #9A	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #9B	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #11	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #12	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #13	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #14	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #15	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #16	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #17	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #18	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #19	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #20	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #21	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #22	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #23	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #24	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Trane Unit #25	0.400 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Training Room Unit	0.180 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
N.W. Offices	0.115 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Center Offices	0.115 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
S.W. Office	0.115 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Lunch Room	0.180 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Conference Room A	0.074 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
Absolute Aire (S&R) Unit	1.080 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-1	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-2	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-3	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-4	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-5	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-6	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-7	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-8	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-9	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-10	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-11	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-12	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-13	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-14	0.310 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-15	0.060 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-16	0.224 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-17	0.115 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-18	0.115 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-19	0.040 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-20	0.224 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-21	0.224 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-22	0.115 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
RTU-23	0.040 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-15-1	0.040 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212(4) Citation</b>	<b>PTI Exemption Rule Citation</b>
IRH-15-2	0.040 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-15-3	0.040 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-15-4	0.040 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-15-5	0.040 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-20-1	0.075 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-20-2	0.075 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-20-3	0.075 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-20-4	0.075 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-20-5	0.075 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
IRH-20-6	0.075 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)

**Draft ROP Terms/Conditions Not Agreed to by Applicant**

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

**Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

**Action taken by EGLE, AQD**

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Heidi Hollenbach, Grand Rapids District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number  
N5056

**RENEWABLE OPERATING PERMIT**  
**August 5, 2021 - STAFF REPORT ADDENDUM**

ROP Number  
MI-ROP-N5056-2021

**Purpose**

A Staff Report dated July 5, 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:	Daniel Groszkiewicz, General Manager 231-652-8453
AQD Contact:	Kaitlyn DeVries, Senior Environmental Quality Analyst 616-558-0552

**Summary of Pertinent Comments**

No pertinent comments were received during the 30-day public comment period.

**Changes to the July 5, 2021 Draft ROP**

No changes were made to the draft ROP.