

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Other

B182424058

FACILITY: Morton Salt		SRN / ID: B1824
LOCATION: 180 Sixth St., MANISTEE		DISTRICT: Cadillac
CITY: MANISTEE		COUNTY: MANISTEE
CONTACT: Don Kuk , Environmental Manager		ACTIVITY DATE: 01/10/2014
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: ROP Technical Review		
RESOLVED COMPLAINTS:		

B1824 – Morton Salt Renewal Technical Review**PART A: GENERAL INFORMATION**

- 1.a The NAICS is correct
- 1.b The word "East" was taken out of the address. The correct address is 180 Sixth Street, Manistee, MI 49660
2. Owner Information
Owner name is correct
3. Confidential Information
None
4. Contact and Responsible Official Information
Don Kuk is listed for the Contact Information and Jacob Bialik is listed as the Responsible Official
5. Additional Information
No AL-001 forms are included for Part A of the Technical Review.

Part B: Application Submittal Information:

- 1.a All boxes checked "Yes"
- 1.b Checked in MACES, no missing information

Part C: Source Requirement Information:

1. **MEARS** – Facility reported emissions from all emission units.
2. **Federal Ozone Depleting Substance Program** – Facility is not subject.
3. **Federal Prevention of Accidental Release Regulations** – Facility is not subject
4. **Greenhouse Gas Emissions**: This site has the potential to emit 100,000 tons per year or more of CO₂e, and 100 tons per year or more are greenhouse gases on a mass basis. Calendar Year 2011 Greenhouse Gas Report was included in Attachment AI-001 **AI Part C**. Boiler No. 6 w/ Coal reported 102,571.0 Metric tons of CO₂, 12.08 Metric Tons CH₄ = 253.7 Metric Tons CO₂e, and 1.760 Metric Tons N₂O = 545.6 Metric Tons of CO₂e. Boiler No. 6 w/ Natural Gas reported 269.0 Metric Tons CO₂, 0.01 Metric Tons CH₄ = 0.2 Metric Tons CO₂e, and 0.00 Metric Tons N₂O = 0.0 Metric Tons CO₂e. No. 1 and No. 3 Filter Burners reported 1987.0 and 1987.0 Metric Tons CO₂ and 0.04 Metric Tons CH₄ = 0.8 Metric Tons of CO₂e, and 0.00 Metric Tons N₂O = 0.0 Metric Tons of CO₂.
5. **CAIR/Acid Rain** – Facility is not subject
6. **Required Plans** - The facility provided a CAM Plan for No. 6 Boiler which was included in Attachment AI-001 **AI Part E**. Additionally on April 23, 2013, (after the DEQ received the ROP Renewal Application), the company submitted a revised Malfunction Abatement Plan (MAP) to reflect new operating parameters for EUTM/BLOCK baghouse. The changes were made due to repairs following routine maintenance.
7. **Additional Information** – Verified the CAM Plan for Boiler No. 6 was included in the application.

Part D: ROP Exempt Emission Unit Information:

No exempt emission units were reported in the ROP Renewal Application. However, after the ROP application was submitted, the DEQ received a Regulatory Review of a Pretzel Salt Project at Morton Salt, dated April 8, 2013. According to the letter, the Pretzel Salt project will include the addition of a pellet press, mill, four screw conveyors, a bucket elevator, and three salt storage silos. The storage silos are exempt according to R 336.1284 Permit to Install Exemptions: Containers, Subpart k. The storage silos will contain fabric filter dust collector vents, and since it is for food grade material the equipment is totally enclosed, the exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement. Additionally, the pretzel salt project does not constitute a major modification of an existing major source under PSD regulations as it will result in an emissions increase below the applicable thresholds.

Part G: Emission Unit Exempt Under Rule 281(h), 285(r)(iv), 287(c), or 290 EUCOLDCLEANERS was listed as exempt (or grandfathered) pursuant to Rule 281(h) or Rule 285(r)(iv), Surface coating line is exempt pursuant to Rule 287(c), and FGHANDLING is exempt pursuant to Rule 290 which is material handling consisting of conveyors and bucket elevators used to transport salt to other processes within the facility.

- 1.a The exempt units identified are truly exempt from Rule 201 in accordance with the applicable rule identified.
- 1.b The exempt emission units are in compliance at the facility.
- 1.c The Emission units are included in MEARS, except for EUCOLDCLEANERS, the DEQ e-mailed Mr. Don Kuk indicating that it is ok the EUCOLDCLEANERS is not included for 2012, but will need to be included for 2013 and beyond.
2. Verified that the emission units are included in in the summary table of working draft of the ROP.
3. This is not applicable.

Part E: Existing ROP Information:

1. Source proposes to make changes and deletions which are further discussed in Part H.
2. All stacks were reported in MEARS.
3. The site contains emission units subject to CAM for the No. 6 Boiler. A CAM Plan is included.
 - a. Reviewed CAM Plan and compared it to the checklist in "Technical Review of CAM Plans" on the DEQ Intranet. CAM plan appears to be complete.
 - b. The CAM plan was included in AI-001 of the ROP application.
4. No fugitive dust emissions.
5. No emission units have been modified or reconstructed where a new PTI was issued.
6. No emission units have been dismantled.

Part F: Permit to Install Information:

No new PTIs have been added.

Part H: Requirements for Additions or Change:

1. Yes there are changes that need to be incorporated into the ROP
 - a. Change EUPELLETCOOLING
2. There are no proposed changes to the existing emission unit names.
3. This site will need to comply with 40 CFR Part 63, Subpart DDDDD. The new emission units for compliance with 40 CFR Part 63, Subpart DDDDD are incorporated into the ROP.
4. A request to remove EUPELLETCOOLING per R336.1284(K) has been made. More specifically, the request stated to change the status of EUPELLETCOOLING to exempt status per R 336.1284 (k). The justification for this request is based on the fact that the collector system is dedicated to venting the salt pellet bin only, which is non-carcinogenic material only. *This emission unit has permitted limits in a table and an NSPS to comply with; therefore, it will remain in the ROP renewal.
5. No consent order or consent judgments have been entered.
6. No additions, changes, and/or deletion request to source-wide requirements.
7. New emission limits for EU#6BOILER to comply with 40 CFR Part 63, Subpart DDDDD.
8. No additions, changes, and/or deletion request to material limit requirements.
9. New process/operational restrictions for EU#6BOILER to comply with 40 CFR Part 63, Subpart DDDDD.
10. New design/equipment parameters for EU#6BOILER to comply with 40 CFR Part 63, Subpart DDDDD.
11. New testing/sampling for EU#6BOILER to comply with 40 CFR Part 63, Subpart DDDDD.
12. New monitoring/recordkeeping for EU#6BOILER to comply with 40 CFR Part 63, Subpart DDDDD.
13. New reporting for EU#6BOILER to comply with 40 CFR Part 63, Subpart DDDDD.
14. A request to have the Boiler No. 6 stack height and diameter requirements included in the ROP. This is added in the ROP, per Morton's request.
15. As stated in H:4 above, a request to remove EUPELLETCOOLING per R336.1284(K) has been made. More specifically, the request stated to change the status of EUPELLETCOOLING to exempt status per R 336.1284(k). The justification for this request is based on the fact that the collector system is dedicated to venting the salt pellet bin only, which is non-carcinogenic material only. EUPELLETCOOLING has permitted limits in a table and an NSPS to comply with; therefore, it will remain in the ROP renewal.

XI: Compliance Plans:

The facility is in compliance and has indicated that they will be in compliance when the ROP is issued.

XII: Review of Working Draft:

1. No changes to source-wide section
2. All emission units are included in the Summary Table.

3. The descriptions listed match the Emission Unit. I changed the details in the EUTM/BLOCK area in Part C of the beginning of the revised ROP and in the Emission Unit Condition, to make the body of the ROP follow the listed Emission Units in the table.
4. Reviewed the emission and material limits and it appears the method of compliance demonstrates compliance with the limits, except for EUPELLETCOOLING and EUPELLPROD. There were no testing methods to determine compliance for opacity. I added testing methods in accordance with methods in 40 CFR Part 60, Subpart OOO.
5. Reviewed each EU and appears that all monitoring equipment is installed, along with the requirement to operate the equipment, and when monitoring should occur.
6. Each emission unit has at least one method of compliance.
7. No known exemptions to add to Part D of the ROP Application.
8. The ROP references the MAP for baseline requirements.
9. No additional streamlined requirements were identified. The streamlined, subsumed requirements are identified in the staff report.
10. Updated Appendix 6 to update PTIs and amendments that have been made since the previous ROP.

NAME

Amyn/Meus

DATE

1/10/14

SUPERVISOR

