



State Registration Number
M0675

Michigan Department Of Environmental Quality
Air Quality Division

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
199600218f

THE REGENTS OF THE UNIVERSITY OF MICHIGAN

SRN: M0675

located at

1239 Kipke Drive, Ann Arbor, Michigan, 48109

Permit Number: 199600218f

Staff Report Date: July 10, 2003

Amended Date: March 8, 2004; December 14, 2005; August
28, 2006; November 3, 2006; May 24, 2007;
April 30, 2009

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

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RENEWABLE OPERATING PERMIT

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STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a Renewable Operating Permit (ROP) pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Article II, Chapter I, Part 55 of PA 451 of 1994. 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 report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit 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:	The Regents of the University of Michigan 1239 Kipke Drive Occupational Safety & Environmental Health Campus Safety Services Building Ann Arbor, MI 48109-1010
Source Registration Number (SRN):	M0675
Standard Industrial Classification (SIC) Code:	8221
Number of Stationary Source Sections:	1
Application Number:	199600218
Responsible Official:	Mr. Henry D. Baier, Associate VP for Facilities & Operations 503 Thompson St. Fleming Administration Bldg Ann Arbor, MI 48109-1340 734-764-3402
AQD Contact:	Mr. Glen Erickson Senior Environmental Quality Analyst 517-780-7851
Date Permit Application Submitted:	October 1, 1996
Date Application Was Administratively Complete:	October 16, 1996
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	July 28, 2003
Deadline for Public Comment:	August 27, 2003

Source Description

The University of Michigan (UM), founded in 1817, is a large public university with its main campus located in Ann Arbor, Michigan. The primary purposes of UM are undergraduate and graduate level education and research which are supported by a wide variety of services and infrastructure, including the operation and maintenance of over 214 major buildings situated on 4 connected campuses (North Campus, Central Campus, Medical Campus, and Athletic/South Campus) encompassing over 1100 acres.

The Central Power Plant supplies the heating, cooling, and electrical demands of a significant portion of the buildings on the Central Campus and the Medical Campus through the operation of 6 large natural gas/oil-fired boilers, 3 electrical generating steam turbines, and 2 cogeneration/combined cycle systems consisting of 2 electrical generating gas-fired turbines and 2 connected heat recovery boilers. Nitrogen oxides (NOx) emission control on both turbines consists of water injection combustion control.

The Central Power Plant has a total power house maximum heat input capacity of approximately 1500 million Btu per hour (MMBtu/hr.) and a faceplate maximum electrical production capability of 44.5 Megawatts (MW).

A secondary power plant, the Hoover Heating Plant, is located on the Athletic/South Campus and supplies steam to several building complexes including transportation fleet services, engineering services, campus police, environmental services, and the athletic complex. This power house consists of 2 medium-sized natural gas/oil-fired boilers with a total heat input capacity of about 115 MMBtu/hr.

The remaining buildings not serviced by the Central Power Plant or the Hoover Heating Plant, such as those of North Campus, are serviced by stand-alone boilers. These relatively small natural gas boilers do not have any underlying applicable requirements subject to the Title V regulations, and therefore, are not listed in the ROP. However, the emissions from these boilers are reported in the aggregate in the annual air emissions reporting.

There are three (3) other emission units of note which are subject to underlying Title V requirements and which are included in the RO Permit. One is the pathological crematory incinerator located in the Anatomy Department in the Medical Sciences Building II, covered by Permit to Install No. 17-84I. This incinerator is specifically exempted from the definition of hospital waste and therefore, is not subject to the recently promulgated Subpart Ce, 40 CFR Part 60.30e, Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators. The other 2 notable emission units are three (3) ethylene oxide (EtO) sterilizers controlled by 2 catalytic oxidizers located at the UM Hospital, covered by Consent Order AQD No. 2-2002 and Permit No. 359-01.

Three historical incinerators previously operated at UM were permanently shut down recently and the Permits to Install were voided. The North Campus pathological incinerator covered by Permit to Install No. 11-82I permanently shut down September 23, 1999. The hospital waste incinerator previously operated at UM Hospital covered by Permit to Install No. 26-85IC was permanently shutdown on September 3, 2000. The animal pathological incinerator previously operated at the Medical Sciences I Building covered by Permit to Install No. 19-87ID was permanently shut down on July 11, 2001.

Source Description

The following table lists stationary source emission information as reported in Michigan Air Emissions Reporting System (MAERS) for **2002** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	149.6
Lead (Pb)	0
Nitrogen Oxides (NO _x)	309.1
Particulate Matter (PM)	12.9
Sulfur Dioxide (SO ₂)	1.4
Volatile Organic Compounds (VOCs)	11.9
Ethylene Oxide (EtO)	0.45

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

See Sections C and D in the draft 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 addressed in the non-applicable requirement section of the staff report and section E of the ROP.

The stationary source is located in Washtenaw County, which is currently designated as attainment for Carbon Monoxide (CO), Lead (Pb), Nitrogen Oxides (NO_x), and Volatile Organic Compounds (VOC) (Ozone), and attainment maintenance for sulfur dioxide (SO₂).

The stationary source is not subject to R336.1220 for Major Offset Sources. Washtenaw County is currently designated as attainment for the pollutants for which this facility is emitting major source quantities.

The stationary source is subject to 40 CFR Part 70 because the potential to emit CO, VOC, SO₂, Particulate Matter (PM), and NO_x in excess of 100 tons per year.

The stationary source is subject to Prevention of Significant Deterioration (PSD) (40 CFR 52.21) regulations because the stationary source has the potential to emit any or all criteria pollutants greater than 100 tons per year and the fossil fuel fired boilers at the stationary source have a combined heat input of greater than 250 million BTU per hour.

The stationary source is considered a major source of Hazardous Air Pollutant (HAP) emissions because the potential to emit of any single HAP regulated by the Clean Air Act, Section 112 is greater than 10 tons per year and the potential to emit of all HAP combined are greater than 25 tons per year.

The stationary source is subject to 40 CFR Part 63, Subpart YYYY, "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines, Proposed Rule," published in Federal Register January 14, 2003. Both of the current turbines, No. 9 and No. 10 are considered "existing" as is the upgraded replacement turbine No. 10, as described in Permit to Install Application No. 275-89B. As "existing" diffusion flame stationary combustion turbines these units, under 40 CFR, Subpart YYYY, 63.6090(b)(3) do not have to meet the requirements of Subpart YYYY or Subpart A of Part 63.

No. 10 turbine is a recent upgrade to the original No.10 turbine, and is covered by the recently issued Permit to Install Application No. 275-89B. This new, upgraded No. 10 turbine is subject to the Compliance Assurance Monitoring (CAM) requirements described in 40 CFR Part 64, which are included in Table E-1.6 EGTO 260-10 and in Appendix 2.

The stationary source is not subject to 40 CFR Part 60, Subpart Ce “Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators,” as adopted by state Rule 933. The currently operating crematory incinerator in the Anatomy Department is not subject by definition. The previously operated units, the UM Hospital incinerator, and the animal incinerator in the Medical Sciences Building II were both physically shut down by the required August 15, 2001 date listed in 40 CFR Part 62.14471. The hospital incinerator was replaced with a rotary autoclave steam sterilizing system exempt from permits pursuant to Rule 281(i), and with no underlying applicable requirement this autoclave system is not included in the ROP.

The stationary source is subject to the New Source Performance Standard (NSPS) 40 CFR Part 60, Subparts A, and Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (100-250 MMBtu/hr.)

The stationary source is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos and renovation projects promulgated in 40 CFR, Part 61, Subpart M, when conducting projects as defined in 40 CFR 61.145.

The stationary source voluntarily agreed to remove the permitted capability to burn No. 6 fuel oil in boilers 1, 2, 3, 4 and 5 at the Central Power Plant as previously allowed under permits to install No. 103-84, 624-84, 625-84, and 626-84, respectively. Therefore, particulate and opacity emission limits associated with burning No. 6 fuel oil were not included in the respective Tables in the RO permit.

Processes in Application Not Identified in Draft RO Permit

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(3) and (4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Exempt Emission Unit ID	Description of Exempt Emission Unit	ROP Exemption	NSR Permit Exemption
DVB0005-01	Boiler1 at Nichols Arboretum	R212(3)(b)	R282(b)(i)
DVB0005-02	Boiler2 at Nichols Arboretum	R212(3)(b)	R282(b)(i)
DVB0047-01	Boiler1 at Oxford Housing	R212(3)(b)	R282(b)(i)
DVB0047-03	Boiler3 at Oxford Housing	R212(3)(b)	R282(b)(i)
DVB0051-01	Boiler1 at Betsy Barbour	R212(3)(b)	R282(b)(i)
DVB0055-01	Boiler1 at Fletcher	R212(3)(b)	R282(b)(i)
DVB0162-01	Boiler1 at WK Kellogg (Penthouse)	R212(3)(b)	R282(b)(i)
DVB0162-04	Boiler4 at WK Kellogg	R212(3)(b)	R282(b)(i)
DVB0183-01	Boiler1 at Lane Hall	R212(3)(b)	R282(b)(i)
DVB0186-01	Boiler1 at Madelon Pound House	R212(3)(b)	R282(b)(i)
DVB0201-01	Boiler1 at Women’s Physical Education	R212(3)(b)	R282(b)(i)
DVB0257-01	Boiler1 at Church St. Parking	R212(3)(b)	R282(b)(i)
DVB0259-01	Boiler1 at Thayer St. Parking	R212(3)(b)	R282(b)(i)
DVB0324-01	Boiler1 at Kellogg Eye Center	R212(3)(b)	R282(b)(i)
DVB0324-02	Boiler2 at Kellogg Eye Center	R212(3)(b)	R282(b)(i)

Exempt Emission Unit ID	Description of Exempt Emission Unit	ROP Exemption	NSR Permit Exemption
DVB0324-03	Boiler3 at Kellogg Eye Center	R212(3)(b)	R282(b)(i)
DVB0324-04	Boiler4 at Kellogg Eye Center	R212(3)(b)	R282(b)(i)
DVB0324-05	Boiler5 at Kellogg Eye Center	R212(3)(b)	R282(b)(i)
DVB0326-01	Boiler1 at Riverview Building	R212(3)(b)	R282(b)(i)
DVB0328-01	Boiler1 at Scott Turner	R212(3)(b)	R282(b)(i)
DVB0335-01	Boiler1 at North Ingalls	R212(3)(b)	R282(b)(i)
DVB0335-02	Boiler2 at North Ingalls	R212(3)(b)	R282(b)(i)
DVB0335-03	Boiler3 at North Ingalls	R212(3)(b)	R282(b)(i)
DVB0396-01	Boiler1 at ITIC/Media Union	R212(3)(b)	R282(b)(i)
DVB0400-01	Boiler1 at Auto Engineering Lab	R212(3)(b)	R282(b)(i)
DVB0400-02	Boiler2 at Auto Engineering Lab	R212(3)(b)	R282(b)(i)
DVB0402-01	Boiler1 at T.I.D.A.L.	R212(3)(b)	R282(b)(i)
DVB0403-01	Boiler1 at Cooley Lab	R212(3)(b)	R282(b)(i)
DVB0403-02	Boiler2 at Cooley Lab	R212(3)(b)	R282(b)(i)
DVB0403-03	Boiler3 at Cooley Lab	R212(3)(b)	R282(b)(i)
DVB0406-01	Boiler1 at Advanced Tech. Lab	R212(3)(b)	R282(b)(i)
DVB0406-02	Boiler2 at Advanced Tech. Lab	R212(3)(b)	R282(b)(i)
DVB0407-01	Boiler1 at GG Brown Lab	R212(3)(b)	R282(b)(i)
DVB0407-02	Boiler2 at GG Brown Lab	R212(3)(b)	R282(b)(i)
DVB0407-03	Boiler3 at GG Brown Lab	R212(3)(b)	R282(b)(i)
DVB0407-04	Boiler4 at GG Brown Lab	R212(3)(b)	R282(b)(i)
DVB0407-05	Boiler5 at GG Brown Lab	R212(3)(b)	R282(b)(i)
DVB0409-01	Boiler1 at Civil Defense	R212(3)(b)	R282(b)(i)
DVB0415-01	Boiler1 at Naval Architecture	R212(3)(b)	R282(b)(i)
DVB0418-01	Boiler1 at North Campus Sves	R212(3)(b)	R282(b)(i)
DVB0419-01	Boiler1 at Laundry Services	R212(3)(b)	R282(b)(i)
DVB0426-01	Boiler1 at Aerospace Engineering Building	R212(3)(b)	R282(b)(i)
DVB0426-02	Boiler2 at Aerospace Engineering Building	R212(3)(b)	R282(b)(i)
DVB0427-01	Boiler1 at North Campus Recreation	R212(3)(b)	R282(b)(i)
DVB0427-02	Boiler2 at North Campus Recreation	R212(3)(b)	R282(b)(i)
DVB0427-03	Boiler3 at North Campus Recreation	R212(3)(b)	R282(b)(i)
DVB0432-01	Boiler1 at Art and Architecture	R212(3)(b)	R282(b)(i)
DVB0432-02	Boiler2 at Art and Architecture	R212(3)(b)	R282(b)(i)
DVB0435-01	Boiler1 at Institute of Science and Tech.	R212(3)(b)	R282(b)(i)
DVB0435-02	Boiler2 at Institute of Science and Tech.	R212(3)(b)	R282(b)(i)
DVB0435-03	Boiler3 at Institute of Science and Tech.	R212(3)(b)	R282(b)(i)
DVB0439-01	Boiler1 at Bentley Library	R212(3)(b)	R282(b)(i)
DVB0439-02	Boiler2 at Bentley Library	R212(3)(b)	R282(b)(i)
DVB0440-01	Boiler1 at School of Music	R212(3)(b)	R282(b)(i)
DVB0440-02	Boiler2 at School of Music	R212(3)(b)	R282(b)(i)
DVB0441-01	Boiler1 at Space Research	R212(3)(b)	R282(b)(i)
DVB0441-02	Boiler2 at Space Research	R212(3)(b)	R282(b)(i)
DVB0442-01	Boiler1 at Pierpont Commons	R212(3)(b)	R282(b)(i)
DVB0442-02	Boiler2 at Pierpont Commons	R212(3)(b)	R282(b)(i)
DVB0443-01	Boiler1 at Chrysler Center	R212(3)(b)	R282(b)(i)
DVB0443-02	Boiler2 at Chrysler Center	R212(3)(b)	R282(b)(i)
DVB0443-03	Boiler3 at Chrysler Center	R212(3)(b)	R282(b)(i)
DVB0444-1	Boiler1 at Transportation Research Inst.	R212(3)(b)	R282(b)(i)

Exempt Emission Unit ID	Description of Exempt Emission Unit	ROP Exemption	NSR Permit Exemption
DVB0444-02	Boiler2 at Transportation Research Inst.	R212(3)(b)	R282(b)(i)
DVB0445-01	Boiler1 at Stearns Building	R212(3)(b)	R282(b)(i)
DVB0449-01	Boiler1 at North Campus Housing Service	R212(3)(b)	R282(b)(i)
DVB0450-01	Boiler1 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-11	Boiler11 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0458-011	Boiler11 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-01	Boiler1 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB-498-01	Boiler1 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0498-08	Boiler8 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0510-01	Boiler1 at Baits 1-Eaton House	R212(3)(b)	R282(b)(i)
DVB0515-01	Boiler1 at Bats 2-Coman House	R212(3)(b)	R282(b)(i)
DVB0555-01	Boiler1 at Bursley	R212(3)(b)	R282(b)(i)
DVB0555-04	Boiler4 at Bursley	R212(3)(b)	R282(b)(i)
DVB0600-01	Boiler1 at Family Housing	R212(3)(b)	R282(b)(i)
DVB0709-01	Boiler1 at Yost Ice Arena	R212(3)(b)	R282(b)(i)
DVB0710-01	Boiler1 at Coliseum	R212(3)(b)	R282(b)(i)
DVB0711-01	Boilers 1 thru 4 at Michigan Stadium	R212(3)(b)	R282(b)(i)
DVB0725-01	Boiler1 at Golf Clubhouse	R212(3)(b)	R282(b)(i)
DVB0728-01	Boiler1 at Eibel Field	R212(3)(b)	R282(b)(i)
DVB0742-01	Boiler1 at Campus Safety Services Building	R212(3)(b)	R282(b)(i)
DVB0742-02	Boiler2 at Campus Safety Services Building	R212(3)(b)	R282(b)(i)
DVB0773-01	Boiler1 at Fisher Stadium	R212(3)(b)	R282(b)(i)
DVB0799-01	Boiler1 at Buhr Building	R212(3)(b)	R282(b)(i)
DVB0805-01	Boiler1 at Hoover Power Plant	R212(3)(b)	R282(b)(i)
DVB0805-02	Boiler2 at Hoover Power Plant	R212(3)(b)	R282(b)(i)
DVB0814-01	Boiler1 at Legal Research	R212(3)(b)	R282(b)(i)
DVB0816-01	Boiler1 at Mail Service	R212(3)(b)	R282(b)(i)
DVB0834-01	Boiler1 at Corner House	R212(3)(b)	R282(b)(i)
DVB0834-02	Boiler2 at Corner House	R212(3)(b)	R282(b)(i)
DVB0851-01	Boiler1 at Observatory Lodge	R212(3)(b)	R282(b)(i)
DVB0851-03	Boiler3 at Observatory Lodge	R212(3)(b)	R282(b)(i)
DVB0858-01	Boiler1 at Madison Building	R212(3)(b)	R282(b)(i)
DVB0861-01	Boiler1 at Inglis House	R212(3)(b)	R282(b)(i)
DVB0862-01	Boiler1 at Inglis Cottage	R212(3)(b)	R282(b)(i)
DVB0867-01	Boiler1 at Inglis Greenhouse	R212(3)(b)	R282(b)(i)
DVB0874-01	Boiler1 at SPH Press Room	R212(3)(b)	R282(b)(i)
DVB0875-01	Boiler1 at 1610 Washtenaw	R212(3)(b)	R282(b)(i)
DVB0866-01	Boiler1 at Trotter House	R212(3)(b)	R282(b)(i)
DVB0890-01	Boiler1 at Perry Building	R212(3)(b)	R282(b)(i)
DVB0890-02	Boiler2 at Perry Building	R212(3)(b)	R282(b)(i)
DVB2501-01	Boiler1 at Printing Auxiliary	R212(3)(b)	R282(b)(i)
DVB2501-02	Boiler2 at Printing Auxiliary	R212(3)(b)	R282(b)(i)
DVB8023-01	Boiler1 at 710 S. Forest	R212(3)(b)	R282(b)(i)
DVB8023-02	Boiler2 at 710 S. Forest	R212(3)(b)	R282(b)(i)
DVDRYERS	Laundry Dryers or various bldg	R212(3)(b)	R281(f)
DVFURNACES	Furnaces less than 50 MM BTU/Hr using	R212(3)(b)	R282(b)(i)

Exempt Emission Unit ID	Description of Exempt Emission Unit	ROP Exemption	NSR Permit Exemption
	Nat Gas		
DVHEATER	Forced Air Heaters at various buildings	R212(3)(b)	R282(b)(i)
DVINTERNALCOMB	Internal Combustion Engines at various buildings	R212(3)(b)	R285(g)
DVKILNS	Kilns at various buildings	R212(3)(b)	R282(a)(iii)
DVKITCHEN	Natural Gas Fired Kitchen Equipment	R212(3)(b)	R282(a)(v)
DVLEADMELT	Electrically heated lead melting operation	R212(3)(b)	R282(a)(iv)
DVMETALMELT	Metal Melting Operations	R212(3)(b)	R282(a)(iv)
DVWATERHEATER	Water Heaters Less than 50 MM BTU/HR using NG	R212(3)(b)	R282(b)(i)
DVB0395-02	Boiler2 at ITIC/Media Union	R212(3)(b)	R282(b)(i)
DVB0396-03	Boiler3 at ITIC/Media Union	R212(3)(b)	R282(b)(i)
DVB0442-03	Boiler3 at Pierpont Commons	R212(3)(b)	R282(b)(i)
DVB0510-02	Boiler2 at Baits 1-Eaton House	R212(3)(b)	R282(b)(i)
DVB0515-02	Boiler2 at Baits 2-Coman House	R212(3)(b)	R282(b)(i)
DVB0051-02	Boiler2 at Betsy Barbour	R212(3)(b)	R282(b)(i)
DVB0555-02	Boiler2 at Bursley	R212(3)(b)	R282(b)(i)
DVB0555-03	Boiler3 at Bursley	R212(3)(b)	R282(b)(i)
DVB0055-02	Boiler2 at Fletcher	R212(3)(b)	R282(b)(i)
DVB0419-02	Boiler2 at Laundry Services	R212(3)(b)	R282(b)(i)
DVB0458-02	Boiler2 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-03	Boiler3 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-04	Boiler4 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-05	Boiler5 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-06	Boiler6 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-07	Boiler7 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-08	Boiler8 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-09	Boiler9 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-10	Boiler10 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0498-02	Boiler2 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0498-03	Boiler3 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0498-04	Boiler4 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0498-05	Boiler5 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0498-06	Boiler6 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0498-07	Boiler7 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0498-09	Boiler9 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0498-10	Boiler10 at Northwood 3	R212(3)(b)	R282(b)(i)
DVB0450-02	Boiler2 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-03	Boiler3 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-04	Boiler4 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-05	Boiler5 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-06	Boiler6 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-07	Boiler7 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-08	Boiler8 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-09	Boiler9 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-10	Boiler10 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-12	Boiler12 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0450-13	Boiler13 at Northwood 1	R212(3)(b)	R282(b)(i)

Exempt Emission Unit ID	Description of Exempt Emission Unit	ROP Exemption	NSR Permit Exemption
DVB0450-14	Boiler14 at Northwood 1	R212(3)(b)	R282(b)(i)
DVB0458-12	Boiler2 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-13	Boiler13 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0458-14	Boiler14 at Northwood 2	R212(3)(b)	R282(b)(i)
DVB0851-02	Boiler2 at Observatory Lodge	R212(3)(b)	R282(b)(i)
DVB0047-02	Boiler2 at Oxford Housing	R212(3)(b)	R282(b)(i)
DVB0047-04	Boiler4 at Oxford Housing	R212(3)(b)	R282(b)(i)
DVB0047-05	Boiler5 at Oxford Housing	R212(3)(b)	R282(b)(i)
DVB0047-06	Boiler6 at Oxford Housing	R212(3)(b)	R282(b)(i)
DVB0328-02	Boiler2 at Scott Turner	R212(3)(b)	R282(b)(i)
DVB0709-02	Boiler2 at Yost Ice Arena	R212(3)(b)	R282(b)(i)
DVB0396-04	Boiler4 at ITIC/Media Union	R212(3)(b)	R282(b)(i)
DVB0442-04	Boiler4 at Pierpont Commons	R212(3)(b)	R282(b)(i)
DVB0162-02	Boiler2 at W.K. Kellog(Penthouse)	R212(3)(b)	R282(b)(i)
DVB0162-03	Boiler3 at W.K. Kellog(Penthouse)	R212(3)(b)	R282(b)(i)
DVMISCELLANEOUS	Boiler for Miscellaneous groups	R212(3)(b)	R282(b)(i)
DVTEMPBOILER	Temporary Boiler	R212(3)(b)	R282(b)(i)
DVGASPALMER	Gas Palmer	R212(3)(b)	R284(g)(i)
DVGASTRANS	Gas Transportation	R212(3)(b)	R284(g)(i)
DV0430-01	Boiler for North Campus Storage Building	R212(3)(b)	R282(b)(i)
DVGASNORTHCAMP	Gas North Campus	R212(3)(b)	R284(g)(i)
DVNORTHCAMPGRO	North Campus Grounds	R212(3)(b)	R284(g)(i)

Equivalent Requirements

This permit does not include any equivalent requirements or significant changes pursuant to Rule 212(5). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original New Source Review (NSR) permit, a Consent Order/Judgment, and/or the State Implementation Plan (SIP).

Non-applicable Requirements

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

Draft ROP Terms/Conditions Not Agreed to by Applicant

This permit 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 the Department

The AQD proposes to approve this permit. 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 Environmental Protection Agency (EPA) is allowed up to 45 days to review the draft permit 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 Carrie Monosmith, Jackson District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit 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 EPA.



State Registration Number
M0675

Michigan Department Of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600218

STAFF REPORT ADDENDUM

Purpose

A Staff Report dated July 10, 2003, 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 Rule 214(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 Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Mr. Henry D. Baier, Associate VP for Facilities & Operations 503 Thompson St. Fleming Administration Bldg Ann Arbor, MI 48109-1340 734-764-3402
AQD Contact:	Mr. Glen Erickson, Senior Environmental Quality Analyst 517-780-7851

Summary of Pertinent Comments

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

Changes to the Regents of the University of Michigan Proposed ROP

No changes were made to the proposed ROP.



State Registration Number
M0675

RENEWABLE OPERATING PERMIT

ROP Number
199600218a

**March 8, 2004 STAFF REPORT FOR RULE
217(2) REOPENING**

Purpose

On October 1, 2003, the Department of Environmental Quality (Department), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600218 to THE REGENTS OF THE UNIVERSITY OF MICHIGAN pursuant to R 336.1214. Once issued, the AQD is required to reopen the ROP as described in R 336.1217. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1217.

General Information

Responsible Official:	Mr. Henry D. Baier, Associate VP for Facilities & Operations 503 Thompson St. Fleming Administration Bldg Ann Arbor, MI 48109-1340 734-764-3402
AQD Contact:	Mr. Glen Erickson, Senior Environmental Quality Analyst 517-780-7851
Date Public Comment Begins:	March 8, 2004
Deadline for Public Comment:	April 7, 2004

Regulatory Analysis

The AQD has determined that the ROP must be reopened because: 1) The test method listed in Table E-1.6 and Table F-1.3 for NOx was not the method specifically mentioned in 40 CFR Part 60.335(c)(3) and 2) NOx Budget Permit No. MI-NOx-880045-2004 has been issued for Emission Units EGBO260-03, EGBO260-04, and EGBO260-06 at this stationary source.

Description of Changes to the ROP

1) Test Method 7E was removed from table E-1.6 and Table F-1.3 and replaced with "As specified in Subpart GG, 40 CFR 60.335." 2) NOx Budget Permit No. MI-NOx-880045-2004 will be added to this ROP as Appendix 10.

Action Taken by the Department

The AQD proposes to approve ROP No. 199600218, which was reopened by the AQD in order to incorporate the changes in NOx test method language and to incorporate NOx Budget Permit No. MI-NOx-880045-2004. A final decision on the approval of the revised ROP will not be made until the public and any affected states have had an opportunity to comment on the proposed changes to the ROP and the United States Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is Carrie Monosmith, Jackson District Supervisor. The final determination for approval of the revised ROP will be based on a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by the public, any affected states or the USEPA.



State Registration Number
M0675

Michigan Department Of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600218a

April 8, 2004 STAFF REPORT ADDENDUM

Purpose

A staff Report dated March 8, 2004 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 reopening 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:	Mr. Henry D. Baier, Associate VP for Facilities & Operations 503 Thompson St. Fleming Administration Bldg Ann Arbor, MI 48109-1340 734-764-3402
AQD Contact:	Mr. Glen Erickson, Senior Environmental Quality Analyst 517-780-7851

Summary of Pertinent Comments

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

Changes to the March 8, 2004 Draft ROP

No changes were made to the draft ROP.



RENEWABLE OPERATING PERMIT

**October 28, 2005 STAFF REPORT FOR
RULE 216(2) MINOR MODIFICATION**

Purpose

On July 10, 2003, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600218 to THE REGENTS OF THE UNIVERSITY OF MICHIGAN pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Terrance G. Alexander, Director 734-647-1143
AQD Contact:	Lori L. Myott, Senior Engineer 517-373-7082
Application Number:	200500209
Date Application For Minor Modification Was Submitted:	September 26, 2005

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

The company requests to add the requirements of Permit to Install No. 308-04A to ROP No. 199600218. This included the addition of Table E-1.7 and the addition of requirements V.1, V.2, V.3, VI.1, VI.2, and VI.3 to Table F-1.3.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the DEQ

The AQD proposes to approve a Minor Modification to ROP No. 199600218, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the Permit Section Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.



State Registration Number
M0675

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600218b

**December 14, 2005, STAFF REPORT ADDENDUM
FOR RULE 216(2) MINOR MODIFICATION**

Purpose

A Staff Report dated July 10, 2003, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

General Information

Responsible Official:	Terrance G. Alexander, Director 734-647-1143
AQD Contact:	Lori L. Myott, Senior Engineer 517-373-7082

Summary of Pertinent Comments

No pertinent comments were received during the USEPA 45-day comment period.

Changes to the Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.



RENEWABLE OPERATING PERMIT

**July 6, 2006 STAFF REPORT FOR RULE 216(2)
MINOR MODIFICATION**

Purpose

On October 21, 2003, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600218 to The Regents of the University of Michigan pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Terrance G. Alexander, Director 734-647-1143
AQD Contact:	Julie L. Brunner, Senior Environmental Engineer 517-373-7088
Application Number:	200600087
Date Application For Minor Modification Was Submitted:	June 8, 2006

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

The company requests to add the requirements of Permit to Install No. 21-06 to ROP No. 199600218. This included the addition of Table E-1.8 with applicable requirements from Permit to Install No. 21-06.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the DEQ

The AQD proposes to approve a Minor Modification to ROP No. 199600218, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is Lynn Fiedler, Permit Section Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.



State Registration Number
M0675

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600218c

**August 28, 2006 STAFF REPORT ADDENDUM FOR
RULE 216(2) MINOR MODIFICATION**

Purpose

A Staff Report dated July 6, 2006, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

General Information

Responsible Official:	Terrance G. Alexander, Director 734-647-1143
AQD Contact:	Julie L. Brunner, Senior Environmental Engineer 517-373-7088

Summary of Pertinent Comments

No pertinent comments were received during the USEPA 45-day comment period.

Changes to the Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.



RENEWABLE OPERATING PERMIT
September 6, 2006 STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION

Purpose

On October 21, 2003, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600218 to THE REGENTS OF THE UNIVERSITY OF MICHIGAN pursuant to R 336.1214. Once issued, the permittee is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Terrance G. Alexander, Director 734-647-1143
AQD Contact:	Hien Nguyen, Environmental Engineering Specialist 517-373-7085
Application Number:	200600116
Date Application For Minor Modification Was Submitted:	August 15, 2006

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

The permittee requests to add the requirements of Permit to Install No. 29-06 to ROP No. 199600218. This permit was issued for the installation of a new Boiler No. 3 to replace existing Boiler No. 3. This included the addition of Tables E-1.9 and E-1.10 and the removal of Table F-1.4.; with all applicable requirements from Permit to Install No. 29-06. The removed Table F-1.4 specified the permit conditions for both existing Boilers No. 3 and 4. The new Table E-1.9 lists the permit conditions for the new Boiler No. 3 and the new Table E-1.10 stipulates the permit conditions for existing Boiler No. 4.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the DEQ

The AQD proposes to approve a Minor Modification to ROP No. 199600218c, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the Permit Section Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.



State Registration Number
M0675

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

**November 3, 2006, STAFF REPORT
ADDENDUM**

ROP Number
199600218d

Purpose

A Staff Report dated July 6, 2006, 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 proposed ROP Minor Modification during the U.S. Environmental Protection Agency's (US EPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

General Information

Responsible Official:	Terrance G. Alexander, Director 734-647-1143
AQD Contact:	Hien Nguyen, Environmental Engineering Specialist 517-373-7085

Summary of Pertinent Comments

No pertinent comments were received during the USEPA 45-day comment period.

Changes to the Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.



State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

M0675

**May 24, 2007 STAFF REPORT FOR
RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE
AMENDMENT**

199600218e

Purpose

On October 21, 2003, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600218 to The Regents of the University of Michigan pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(1)(a)(i-iv).

General Information

Responsible Official:	Terrance G. Alexander, Executive Director 734-647-1143
AQD Contact:	Cari DeBruler, Secretary 517-335-4607
Application Number:	200700068
Date Application For Administrative Amendment Was Submitted:	May 16, 2007

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to R 336.1216(1)(a)(i).

Description of Changes to the ROP

Omit Stack/Vent Parameter "Exhaust gases shall be discharged unobstructed vertically upwards unless otherwise noted" from table EGB0805-04.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Administrative Amendment to the ROP.

Action Taken by the DEQ

The AQD approved an Administrative Amendment to ROP No. 199600218d, as requested by the stationary source. The delegated decision maker for the AQD is the Permit Section Supervisor.



RENEWABLE OPERATING PERMIT

**March 6, 2009 STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION**

Purpose

On October 21, 2003, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600218 to The University of Michigan pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Terrance G. Alexander, Executive Director 734-647-1143
AQD Contact:	Danita J. Brandt, Senior Engineering Specialist 517-373-7034
Application Number:	200800119
Date Application For Minor Modification Was Submitted:	October 7, 2008

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

The company is requesting the incorporation of special conditions from Permit to Install No. 13-08 into the ROP. This PTI was issued for two natural gas/distillate fuel oil-fired firetube boilers, two natural gas-fired watertube boilers and three diesel fuel-fired emergency generator sets.

Description of Changes to the ROP

Special Conditions have been added to the ROP for the four boilers and three generators. These conditions are in Table F-1.9: FGBOILER1-2; Table F-1.10: FGBOILER3-4; and Table F-1.11: FGDGEN1-3.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the DEQ

The AQD proposes to approve a Minor Modification to ROP No. 199600218e, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the Permit

Section Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.



State Registration Number
M0675

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600218f

**April 30, 2009 STAFF REPORT ADDENDUM FOR
RULE 216(2) MINOR MODIFICATION**

Purpose

A Staff Report dated March 6, 2009, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

General Information

Responsible Official:	Terrance G. Alexander, Executive Director 734-647-1143
AQD Contact:	Danita J. Brandt, Senior Engineering Specialist 517-373-7034

Summary of Pertinent Comments

No pertinent comments were received during the USEPA 45-day comment period.

Changes to the March 6, 2009 Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.