

State Registration Number
B1577

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B1577-2020

Grede, LLC - Iron Mountain

State Registration Number (SRN): B1577

Located at

801 South Carpenter Avenue, Kingsford, Dickinson County, Michigan 49802

Permit Number: MI-ROP-B1577-2020

Staff Report Date: May 4, 2020

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).

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MAY 4, 2020 - STAFF REPORT

MI-ROP-B1577-2020

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:	Grede, LLC - Iron Mountain 801 South Carpenter Avenue Kingsford, Michigan 49802
Source Registration Number (SRN):	B1577
North American Industry Classification System (NAICS) Code:	331511
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	2001900037
Responsible Official:	Tyler Hill, General Manager 906-779-0201
AQD Contact:	Joseph Scanlan, Environmental Quality Analyst 906-458-6405
Date Application Received:	March 8, 2019
Date Application Was Administratively Complete:	March 8, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	May 4, 2020
Deadline for Public Comment:	June 3, 2020

Source Description

Grede, LLC. – Iron Mountain is located in the city of Kingsford and produces gray iron castings used primarily in industrial machinery, hydraulic valves, and agricultural equipment. The major production operations are raw material handling and preparation, mold and core production, metal melting, pouring and cooling, and casting finishing.

At the facility, molten iron is produced in a cupola controlled with an afterburner for carbon monoxide control and a quench tank and a totally enclosed treatment system and baghouse for particulate control. Other processes at the facility are controlled with air pollution control equipment including wet scrubbers, baghouses, cartridge filters, and acid scrubbers.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year 2019.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	0.58
Lead (Pb)	0.0002
Nitrogen Oxides (NO _x)	3.88
Particulate Matter (PM)	6.60
Sulfur Dioxide (SO ₂)	1.89
Volatile Organic Compounds (VOCs)	26.83

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2019 by AQD:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Benzene	0.0037
Hydrochloric Acid (HCl)	0.0323
Manganese	0.0011
Mercury	0.0069
Total Hazardous Air Pollutants (HAPs)	0.044

**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 Dickinson 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 volatile organic compounds exceeds 100 tons per year and the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year. EU-P009 CUPOLA, EU-P016 MAIN PLANT POURING AND COOLING and EU-P036 MODULE POURING AND

COOLING at the stationary source are subject to the Maximum Achievable Control Technology Standards for Iron and Steel Foundries promulgated in 40 CFR Part 63, Subparts A and EEEEE.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit volatile organic compounds was less than 100 tons per year.

In August of 2015, numerous compliance issues were discovered during an unannounced inspection to determine compliance with MI-ROP-B1577-2014a. Due to the severity of the compliance issues a violation notice was issued and escalated enforcement action resulted in the issuance of Administrative Consent Order 23-2016. Follow-up inspections during 2018 showed the facility continued to have compliance issues based on violations of Rules 370, 901 and 910, PTI number 186-16, ACO No. 23-2016 and MI-ROP-B1577-2014a and additional violation notices were issued. It was also determined that the facility was in violation of 40 CFR Part 63, Subpart EEEEE for failure to conduct performance testing within the timeline established by the regulation. The facility conducted the required performance test and additional required emissions testing in April of 2019, however some of the sampling protocol used during these tests was determined to be outside the parameters of USEPA sampling methodology and some of the results were deemed invalid. The facility is in the process of rescheduling emissions testing. EGLE, AQD is currently pursuing additional escalated enforcement actions against the facility and is in the process of negotiating a new Administrative Consent Order.

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? *
EU-P009 CUPOLA	CO/21.0 pph	R 336.1201(3)	Afterburner	1300 degrees Fahrenheit minimum	EU-P009 CUPOLA	No
EU-P009 CUPOLA	CO/92 tpy	R 336.1201(3)	Afterburner	1300 degrees Fahrenheit minimum	EU-P009 CUPOLA	No
EU-P009 CUPOLA	CO/250 mg per cubic meter corrected to 70F and 29.92" Hg	R 336.1201(3)	Afterburner	1300 degrees Fahrenheit minimum	EU-P009 CUPOLA	No
EU-P009 CUPOLA	PM/0.011 pound per 1000 pounds of exhaust gases	R 336.1331	Baghouse	Differential Pressure Gauge/1.0 inches minimum; Fan amperage range 115 to 281 amperes; daily VE	EU-P009 CUPOLA	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
				readings/zero opacity		
EU-P009 CUPOLA	PM10/1.30 pph	R 336.1331	Baghouse	Differential Pressure Gauge/1.0 inches minimum; Fan amperage range 115 to 281 amperes; daily VE readings/zero opacity	EU-P009 CUPOLA	No
EU-P009 CUPOLA	PM10/5.69 tpy	R 336.1331	Baghouse	Differential Pressure Gauge/1.0 inches minimum; Fan amperage range 115 to 281 amperes; daily VE readings/zero opacity	EU-P009 CUPOLA	No
EU-P012 MAIN PLANT SAND SYSTEM	PM/0.005 pound per 1000 pounds of exhaust gases	R 336.1331	Baghouse	Differential Pressure Gauge/range of 2.0 to 4.0 inches; Fan amperage range 122 to 137 amperes; daily VE readings/zero opacity	EU-P012 MAIN PLANT SAND SYSTEM	No
EU-P012 MAIN PLANT SAND SYSTEM	PM10/1.27 pph	R 336.1331	Baghouse	Differential Pressure Gauge/range of 2.0 to 4.0 inches; Fan amperage range 122 to 137 amperes; daily VE readings/zero opacity	EU-P012 MAIN PLANT SAND SYSTEM	No
EU-P012 MAIN PLANT SAND SYSTEM	PM10/5.56 tpy	R 336.1331	Baghouse	Differential Pressure Gauge/range of 2.0 to 4.0	EU-P012 MAIN PLANT	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
				inches; Fan amperage range 122 to 137 amperes; daily VE readings/zero opacity	SAND SYSTEM	
EU-P014 MAIN PLANT FINISHING	PM/0.01 pound per 1000 pounds of gases	R 336.1331	Baghouse	Differential Pressure Gauge/range of: 5.0" - 7.0" water column for West Fuller Baghouse, 5.0" - 7.0" water column for East Fuller Baghouse, 3.5" - 5.5" water column for Steelcraft Baghouse; Fan amperage range: 120 – 140 amperes for West Fuller Baghouse, 100 - 120 amperes for East Fuller Baghouse, 145 - 165 amperes for Steelcraft Baghouse; daily VE readings/zero opacity	EU-P014 MAIN PLANT FINISHING	No
EU-P014 MAIN PLANT FINISHING	PM10/0.33 pph	R 336.1331	Baghouse	Differential Pressure Gauge/range of: 5.0" - 7.0" water column for West Fuller Baghouse, 5.0" - 7.0" water column for East Fuller Baghouse, 3.5" - 5.5" water column for	EU-P014 MAIN PLANT FINISHING	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
				Steelcraft Baghouse; Fan amperage range: 120 – 140 amperes for West Fuller Baghouse, 100 - 120 amperes for East Fuller Baghouse, 145 - 165 amperes for Steelcraft Baghouse; daily VE readings/zero opacity		
EU-P014 MAIN PLANT FINISHING	PM10 1.45 tpy	R 336.1331	Baghouse	Differential Pressure Gauge/range of: 5.0" - 7.0" water column for West Fuller Baghouse, 5.0" - 7.0" water column for East Fuller Baghouse, 3.5" - 5.5" water column for Steelcraft Baghouse; Fan amperage range: 120 – 140 amperes for West Fuller Baghouse, 100 - 120 amperes for East Fuller Baghouse, 145 - 165 amperes for Steelcraft Baghouse; daily VE readings/zero opacity	EU-P014 MAIN PLANT FINISHING	No
EU-P018 MAIN PLANT SHAKEOUT	PM/0.013 pound per 1000 pounds of	R 336.1331	Baghouse	Differential Pressure Gauge/range of: 1" to 6" water column	EU-P018 MAIN PLANT SHAKEOUT	No

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
	exhaust gases			for Torit Baghouse #1, 3" to 7" water column for Linsmeyer baghouse, 2" to 10" water column for Hermann baghouse; Fan amperage range: 175 – 210 amperes for Torit baghouse, 55 – 85 amperes for Linsmeyer baghouse, 160 - 210 amperes for Hermann baghouse; daily VE readings/zero opacity		
EU-P018 MAIN PLANT SHAKEOUT	PM10/1.03 pph	R 336.1331	Baghouse	Differential Pressure Gauge/range of: 1" to 6" water column for Torit Baghouse #1, 3" to 7" water column for Linsmeyer baghouse, 2" to 10" water column for Hermann baghouse; Fan amperage range: 175 – 210 amperes for Torit baghouse, 55 – 85 amperes for Linsmeyer baghouse, 160 - 210 amperes for Hermann baghouse; daily	EU-P018 MAIN PLANT SHAKEOUT	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
				VE readings/zero opacity		
EU-P018 MAIN PLANT SHAKEOUT	PM10/4.51 tpy	R 336.1331	Baghouse	Differential Pressure Gauge/range of: 1" to 6" water column for Torit Baghouse #1, 3" to 7" water column for Linsmeyer baghouse, 2" to 10" water column for Hermann baghouse; Fan amperage range: 175 – 210 amperes for Torit baghouse, 55 – 85 amperes for Linsmeyer baghouse, 160 - 210 amperes for Hermann baghouse; daily VE readings/zero opacity	EU-P018 MAIN PLANT SHAKEOUT	No
EU-P018 MAIN PLANT SHAKEOUT	PM/0.8 pph	R 336.1205 R 336.1331 40 CFR 52.21(c) & (d)	Baghouse	Differential Pressure Gauge/range of: 1" to 6" water column for Torit Baghouse #1, 3" to 7" water column for Linsmeyer baghouse, 2" to 10" water column for Hermann baghouse; Fan amperage range: 175 – 210 amperes	EU-P018 MAIN PLANT SHAKEOUT	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
				for Torit baghouse, 55 – 85 amperes for Linsmeyer baghouse, 160 - 210 amperes for Hermann baghouse; daily VE readings/zero opacity		
EU-P018 MAIN PLANT SHAKEOUT	PM10/0.6 pph	R 336.1205 40 CFR 52.21(c) & (d)	Baghouse	Differential Pressure Gauge/range of: 1" to 6" water column for Torit Baghouse #1, 3" to 7" water column for Linsmeyer baghouse, 2" to 10" water column for Hermann baghouse; Fan amperage range: 175 – 210 amperes for Torit baghouse, 55 – 85 amperes for Linsmeyer baghouse, 160 - 210 amperes for Hermann baghouse; daily VE readings/zero opacity	EU-P018 MAIN PLANT SHAKEOUT	No
EU-P032 MODULE SAND SYSTEM	PM/0.10 pound per 1000 pounds of exhaust gases	R 336.1331	Baghouse	Differential Pressure Gauge/range of 1.0" to 6.0"; Fan amperage range 175 to 220 amperes; daily VE readings/zero opacity	EU-P032 MODULE SAND SYSTEM	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
EU-P032 MODULE SAND SYSTEM	PM10/1.27 pph	R 336.1331	Baghouse	Differential Pressure Gauge/range of 1.0" to 6.0"; Fan amperage range 175 to 220 amperes; daily VE readings/zero opacity	EU-P032 MODULE SAND SYSTEM	No
EU-P032 MODULE SAND SYSTEM	PM10/5.56 tpy	R 336.1331	Baghouse	Differential Pressure Gauge/range of 1.0" to 6.0"; Fan amperage range 175 to 220 amperes; daily VE readings/zero opacity	EU-P032 MODULE SAND SYSTEM	No
EU-P040 SAND CONDITIONI NG SYSTEM	PM/0.03 pound per 1000 pounds of exhaust gases	R 336.1331	Baghouse	Differential Pressure Gauge/range of 3.5" to 5,5"; Fan amperage range 145 to 165 amperes; daily VE readings/zero opacity	EU-P040 SAND CONDITIONI NG SYSTEM	No
EU-P040 SAND CONDITIONI NG SYSTEM	PM10/2.00 pph	R 336.1331	Baghouse	Differential Pressure Gauge/range of 3.5" to 5,5"; Fan amperage range 145 to 165 amperes; daily VE readings/zero opacity	EU-P040 SAND CONDITIONI NG SYSTEM	No
EU-P040 SAND CONDITIONI NG SYSTEM	PM10/8.76 tpy	R 336.1331	Baghouse	Differential Pressure Gauge/range of 3.5" to 5,5"; Fan amperage range 145 to 165 amperes; daily VE readings/zero opacity	EU-P040 SAND CONDITIONI NG SYSTEM	No

*Presumptively Acceptable Monitoring (PAM)

EU-P009 CUPOLA at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64. This emission unit has a control device and potential pre-control emissions of CO and PM/PM10 greater than the major source threshold level. The monitoring for the control device for CO is continuous afterburner temperature monitoring and recording. Proper afterburner temperature is indicative of good combustion efficiency for CO destruction. The monitoring for the control device for PM/PM10 is visible emissions observations, baghouse pressure drop and fan amperage monitoring and recording. Monitoring of these three parameters provide an indication of proper baghouse operation.

EU-P012 MAIN PLANT SAND SYSTEM at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64. This emission unit has a control device and potential pre-control emissions of PM/PM10 greater than the major source threshold level. The monitoring for the control device for PM/PM10 is visible emissions observations, Torit fabric filter baghouse pressure drop and fan amperage monitoring and recording. Monitoring of these three parameters provide an indication of proper baghouse operation.

EU-P014 MAIN PLANT FINISHING at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64. This emission unit has three control devices and potential pre-control emissions of PM/PM10 greater than the major source threshold level. The monitoring for the control devices for PM/PM10 is visible emissions observations, baghouse pressure drops and fan amperage monitoring and recording. Monitoring of these three parameters provide an indication of proper baghouse operation.

EU-P018 MAIN PLANT SHAKEOUT at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64. This emission unit has three control devices and potential pre-control emissions of PM/PM10 greater than the major source threshold level. The monitoring for the control devices for PM/PM10 is visible emissions observations, baghouse pressure drops and fan amperage monitoring and recording. Monitoring of these three parameters provide an indication of proper wet collector operation.

EU-P032 MODULE SAND SYSTEM at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64. This emission unit has a control device and potential pre-control emissions of PM/PM10 greater than the major source threshold level. The monitoring for the control device for PM/PM10 is visible emissions observations, Torit fabric filter baghouse pressure drop and fan amperage monitoring and recording. Monitoring of these three parameters provide an indication of proper baghouse operation.

EU-P040 SAND CONDITIONING SYSTEM at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64. This emission unit has a control device and potential pre-control emissions of PM/PM10 greater than the major source threshold level. The monitoring for the control device for PM/PM10 is visible emissions observations, Steelcraft fabric filter baghouse pressure drop and fan amperage monitoring and recording. Monitoring of these three parameters provide an indication of proper baghouse operation

The emission limitations contained in FGMACT-EEEEEE for EU-P009 CUPOLA, EU-P016 MAIN PLANT POURING AND COOLING and EU-P036 MODULE POURING AND COOLING at the stationary source are exempt from the federal Compliance Assurance Monitoring regulation under 40 CFR Part 64, because the emission limitations are addressed by the Maximum Achievable Control Technology Standards for Iron and Steel Foundries promulgated in 40 CFR, Part 63, Subparts A and EEEEE.

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-B1577-2014 are identified in Appendix 6 of the ROP.

PTI Number			
186-16	256-09A	302-04	254-04
232-04	199-04A	117-04	381-96E
548-95	490-94	862-92	785-92
52-92A	1238-91	609-82	661-79
1005-78	951-78	134-78A	829-77
358-77C	319-77	162-77	396-74
395-74	349-74	268-74	7-72

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
EU-SPACEHTRS	Natural gas space heaters and hot water boilers with a combined rated heat input capacity of 250,000 Btu/hr.	Rule 212(4)(b)	Rule 282(2)(b)(i)
EU-PARTOILSTORE	Storage of parting oil in an 8,000 gallon aboveground storage tank.	Rule 212(3)(e)	Rule 284(2)(c)
EU-HOTBLASTTUBES	Cupola Hot Blast Tubes fired with natural gas with rated heat input capacity less than 50 MMBtu/hr.	Rule 212(4)(b)	Rule 282(2)(b)(i)
EU-SHELLCOREOVEN	Shell core oven fired with natural gas with a rated heat input capacity less than 50 MMBtu/hr.	Rule 212(4)(b)	Rule 282(2)(b)(i)
EU-COREWASHOVEN	Corewash oven fired with natural gas with a rated heat input capacity less than 50 MMBtu/hr.	Rule 212(4)(b)	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

*** EGLE AQD is currently pursuing additional escalated enforcement actions against the facility and is in the process of negotiating a new Administrative Consent Order (ACO). This section of the Staff Report will be amended when the new ACO is issued.**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements at the time of issuance of the ROP except for requirements listed in Appendix 2. The table in Appendix 2 contains a Schedule of Compliance developed pursuant to Rule 119(a)(i). The applicant must adhere to this schedule and provide the required certified progress reports at least semiannually or in accordance with the schedule in the table. A Schedule of Compliance for any applicable requirement that the source is not in compliance with at the time of ROP issuance is supplemental to, and shall not sanction non-compliance with, the applicable requirements on which it is based.

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 Ed Lancaster, Marquette 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.

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RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-B1577-2020

JULY 30, 2020 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated May 4, 2020, 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:	Tyler Hill, General Manager 906-779-0201
AQD Contact:	Joseph Scanlan, Environmental Quality Analyst 906-458-6405

Summary of Pertinent Comments

This Addendum is to explain the events that occurred since the end of the combined public comment period, on June 3, 2020, for the draft ROP No. MI-ROP-B1577-2020.

The AQD's response to pertinent comments follows.

Changes to the May 04, 2020 Draft ROP

Grede Comment:

Grede maintains that stacks SV-S016-324-180, SV-S016-324184, SV-S016-324192, SV-S016-324200, and SV-S016-324292. are no longer collecting and emitting emissions from EU-P016 Main Plant Pouring and Cooling Lines. The stacks have been removed and the ceiling sealed.

AQD Response:

AQD agrees. Stacks SV-S016-324-180, SV-S016-324184, SV-S016-324192, SV-S016-324200, and SV-S016-324292 have been removed.

Grede Comment:

Grede maintains that for EU-P016 stacks SV-S016-324176, SV-S016-324188, SV-S016-196, and SV-S016-204 are present for general ventilation at the rooftop, only, and are not capturing emissions from Main Plant Pouring and Cooling processes any longer. Therefore, these four stacks are no longer utilized to assess FG-MACT EEEEE compliance.

AQD Response:

AQD agrees. Stacks SV-S016-324176, SV-S016-324188, SV-S016-196, and SV-S016-204 have been removed from FG-MACT-EEEEE.

Grede Comment:

Grede maintains that for EU-P021 Isocure stack SV-S021-324686 no longer exists. Stack SV-S021-324687 is the stack associated with the new isocure baghouse and should be added to the permit. This

baghouse is exempt from permitting however the stack should be recognized in the ROP. The stack has a height of 22 feet and a diameter of 15 inches. Please add Stack SV-S021-324687.

AQD Response:

AQD agrees. Stack SV-S021-324687 has been added to EU-P021-Isocure.

Grede Comment:

Grede respectfully requests that any future stack testing for emission units EU-P011, EU-P012, EU-P014, EU-P034, EU-P038, EU-P040, EU-P041, EU-P02, and EU-P043 be completed upon request from the AQD Supervisor. Upon request from the AQD Supervisor, the permittee will verify the appropriate emission rates by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A and Part 10 of the Michigan Air Pollution Control Rules. The permittee believes that testing every five years is unwarranted given the minimal actual emissions reported from these emission units and the costs would be excessive and provide very little value.

None of the emission units emitted over one ton of PM10 in 2019. Actual 2019 PM10 emissions for each unit are indicated in the following table:

Emission Unit	Annual PM10 emissions (pounds)
EU-P011	0
EU-P012	1384
EU-P014	396
EU-P021	38
EU-P034	91
EU-P038	134
EU-P040	1709
EU-P041	12
EU-P042	2
EU-P043	14

AQD Response:

AQD agrees that the language should be changed to require testing at the request of the AQD District Supervisor. Emission units EU-P011, EU-P012, EU-P014, EU-P034, EU-P038, EU-P040, EU-P041, EU-P02 and EU-P043 have PM10 emission limits and therefore standard testing language has been added to the draft ROP, however it is agreed that calculated emissions do not warrant testing every five years.

Grede Comment:

EGLE added permit language in the cupola section of the draft permit requiring a Quality Improvement Plan (QIP) if 5 excursions or deviations are reported in any given 90-day period. Grede respectfully requests that the QIP language be removed from the permit. We understand that a QIP is a written plan that outlines the procedures that will be used to evaluate problems that affect the performance of control equipment. Grede does not believe the cupola control equipment has malfunctioned nor do they have reason to believe it will malfunction, therefore a QIP is not deemed necessary.

AQD Response:

The QIP language for EU-P009 Cupola is an optional CAM requirement for facilities with a history of excursions. Past observations from AQD staff have indicated malfunctions of control equipment associated with EU-P009 Cupola. The QIP language and threshold level of excursions will remain in the draft ROP for EU-P009 Cupola.

Grede Comment:

Similar to a previous Public comment we requested and that was successfully removed related Kloster heater/cooler associated with EU-P011, Grede also requests removal of the Kloster heater/cooler

associated with EU-P021. Grede requests that the references be removed from page 16 of the draft permit (one reference in the Emission Unit Description) and page 43 (two references; one in the Description section and one in the Pollution Control Equipment section). With these proposed changes, the draft permit will no longer have any references to Kloster.

We also request under Stack & Vent ID to add SV-S021-324598. The stack is identical to the acid scrubber stack and measures 10 X 12" and is 38 feet in height (i.e., it is identical to 324596 for the acid scrubber).

AQD Response:

All language related to the Kloster heater/cooler for EU-P021 has been removed from the ROP and stack SV-S021-324598 has been added to the Stack & Vent ID for EU-P021 as requested.

Grede Comment:

On page 38 under Emission Limits for EU-P018 Main Plant Shakeout and on page 73 under Stack & Vent ID, please delete SV-S032-334104. That particular stack was related to the old module wet collector that was replaced by the Torit collector stack.

AQD Response:

Stack SV-S032-334104 has been deleted from the Stack/Vent ID for EU-P043 Module Isocure as requested.

Grede Comment:

Page 4 of 17 of the EGLE May 4, 2020 Staff Report references EU-P044, Ductile Iron. While all references to EU-P044 have been successfully removed from the current version of the draft ROP, Grede suggests removing the reference in the staff report, too. By doing so, the current version of the draft ROP and Staff Report will not be conflicting on this process.

AQD Response:

The reference to EU-P044 Ductile Iron has been removed from the Staff Report.