

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
B3518

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B3518-2011

United States Gypsum Company

SRN: B3518

Located at

10090 West Jefferson Ave., River Rouge, Michigan 48218

Permit Number: MI-ROP-B3518-2011

Staff Report Date: August 15, 2011

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) requires that the Michigan Department of Environmental Quality (MDEQ), 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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August 15, 2011 STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a 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 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 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:	United States Gypsum Company 10090 West Jefferson Ave. River Rouge, Michigan 48218
Source Registration Number (SRN):	B3518
North American Industry Classification System (NAICS) Code:	327420
Number of Stationary Source Sections:	3
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200600025
Responsible Official:	Mr. Mike Inman, Mill/Board Manager 313-842-4455 Mr. Matthew Craig, Plant Manager 313-842-4455
AQD Contact:	Mr. Jonathan Lamb, Senior Environmental Quality Analyst 313-456-4683
Date Permit Application Received:	February 15, 2006
Date Application Was Administratively Complete:	February 15, 2006
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	August 15, 2011
Deadline for Public Comment:	September 14, 2011

Source Description

United States Gypsum is located on the west side of West Jefferson Avenue, in the city of River Rouge, Wayne County. It occupies 21 acres bordered by a railroad, Jefferson Ave, and the banks of the Rouge River. This area is mainly industrial, and the nearest residence is approximately 150 yards south of the main entrance.

Gypsum wallboard is the main product manufactured at United States Gypsum. The facility also is capable of producing cement board; however, the board plant is currently idled, though is being kept active in the permit in case the company decides to restart operations of that product.

The primary raw material used is gypsum, or calcium sulfate, which forms airborne particulate during the manufacturing process. The plant has a large number of baghouse-type dust collectors to control these emissions.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2010** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Lead (Pb)	0.00
Nitrogen Oxides (NO _x)	1.4
Particulate Matter (PM)	5.3
Sulfur Dioxide (SO ₂)	0.01
Volatile Organic Compounds (VOCs)	0.03
Carbon Monoxide (CO)	4.1

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

See Parts 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 explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in Wayne County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment for all criteria pollutants except PM 2.5.

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

No emission units at the stationary source are subject to review under the Prevention of Significant Deterioration regulations of CFR 40, PART 52.21 because at the time of New Source Review permitting the potential to emit of particulate matter was less than 250 tons per year.

EU-5, EU-9, EU-10, EU-23, EU-34, EU-35, EU-48, and EU-60 of Section 1 and EU-14, EU-16, EU-19, EU-26, EU-31, EU-39, EU-40, and EU-46 of Section 3 at the stationary source are subject to the New Source Performance Standards for Nonmetallic Mineral Processing Plants promulgated in 40 CFR, Part 60, Subparts A and OOO.

EU-6, EU-36, EU-37, and EU-38 of Section 1 at the stationary source are subject to the New Source Performance Standards for Calciners and Dryers for Mineral Industries promulgated in 40 CFR, Part 60, Subparts A and UUU.

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."

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

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. 199600030 are identified in Appendix 6 of the ROP.

PTI Number			
C-7164	C-7212	C-7297	C-7734
C-7735	C-7759	C-7806	C-7879
C-7880	C-7881	C-8559	C-8560
C-8698	C-8733	C-8734	C-8735
C-8736	C-8736	C-9072	C-9374
C-2207	C-2208	183-98	C-5029
C-7035	C-9904	C-9905	251-99
C-10713	C-6516	C-7027	C-2212
C-4812	C-4913	C-4914	C-6410
C-6696	C-10194		

Streamlined/Subsumed Requirements

The following table lists explanations of any streamlined/subsumed requirements included in the ROP pursuant to Rules 213(2) and 213(6). All subsumed requirements are enforceable under the streamlined requirement that subsumes them.

SECTION 1

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
EU-5, EU-10, EU-23, EU-34	I.1	0.029 lbs per 1,000 lbs of exhaust gas (R 336.1201, R 336.1331(1)(c))	0.05 gram per dry standard cubic meter (40 CFR 60.672(a))	0.029 lb/1000 lb is equivalent to 0.035 g/dscm; therefore, the current permitted emission rate is more

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
				stringent than the NSPS standard.
EU-5, EU-10, EU-23	I.4	7% opacity (40 CFR 60.672(a))	10% opacity (R 336.1201, R 336.1301, R 336.1303)	The NSPS standard of 7% opacity is more stringent than the permit limit of 10%.
EU-6	I.1	0.042 lbs per 1,000 lbs of exhaust gas (R 336.1201, R 336.1331(1)(c))	0.057 gram per dry standard cubic meter (40 CFR 60.732(a))	0.042 lb/1000 lb is equivalent to 0.05 g/dscm; therefore, the current permitted emission rate is more stringent than the NSPS standard.
EU-9	I.1	0.05 grams per dry standard cubic meter (40 CFR 60.672(a))	0.1 lbs per 1000 lbs of exhaust gas (R 336.1201, R 336.1331(1)(c))	The NSPS standard of 0.05 g/dscm is equivalent to 0.042 lb/1000 lb, which is more stringent than the current permitted limit. Since the emission unit is subject to NSPS Subpart OOO, the more stringent limit was added to the permit.
EU-48	I.1	0.01 grains per dry standard cubic foot (R 336.1201, R 336.1331(1)(c))	0.022 grains per dry standard cubic foot (40 CFR 60.672(a))	The current permitted emission rate of 0.01 gr/dscf is more stringent than the NSPS standard of 0.022 gr/dscf.
FG-KETTLES	I.1	0.05 gram per dry standard cubic meter for each calcining kettle (R 336.1201, R 336.1331(1)(c))	0.092 gram per dry standard cubic meter for each calcining kettle (40 CFR 60.732(a))	The current permitted emission rate of 0.05 g/dscm is more stringent than the NSPS standard of 0.092 g/dscm.
FG-KETTLES	I.4	7% opacity for each calcining kettle (R 336.1201, R 336.1301, R 336.1303)	10% opacity for each calcining kettle (40 CFR 60.732(b))	The current permitted opacity limit of 7% is more stringent than the NSPS standard of 10% for calcining kettles.

SECTION 2

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
NA	NA	NA	NA	NA

SECTION 3

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
EU-14	I.1	0.029 lbs per 1,000 lbs of exhaust gas (R 336.1201, R 336.1331(1)(c))	0.05 gram per dry standard cubic meter (40 CFR 60.672(a))	0.029 lb/1000 lb is equivalent to 0.035 g/dscm; therefore, the current permitted emission rate is more stringent than the NSPS standard.
EU-14, EU-19, EU-31, EU-46	I.4	7% opacity (40 CFR 60.672(a))	10% opacity (R 336.1201, R 336.1301, R 336.1303)	The NSPS standard of 7% opacity is more stringent than the permit limit of 10%.
EU-19	I.1	0.042 lbs per 1,000 lbs of exhaust gas (R 336.1201, R 336.1331(1)(c))	0.05 gram per dry standard cubic meter (40 CFR 60.672(a))	0.042 lb/1000 lb is equivalent to 0.05 g/dscm; therefore, the current permitted emission rate is more stringent than the NSPS standard.
EU-31, EU-39, EU-46	I.1	0.019 lbs per 1,000 lbs of exhaust gas (R 336.1201, R 336.1331(1)(c))	0.05 gram per dry standard cubic meter (40 CFR 60.672(a))	0.019 lb/1000 lb is equivalent to 0.023 g/dscm; therefore, the current permitted emission rate is more stringent than the NSPS standard.

Equivalent Requirements

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

Non-applicable Requirements

Part 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 (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

There were no processes listed in the ROP application as exempt devices under Rule 212(4). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

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 at the time of issuance of the ROP except for requirements listed in Appendix 2 of Sections 1, 2, and 3 of the draft ROP. 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 permit issuance is supplemental to, and shall not sanction non-compliance with, the applicable requirements on which it is based.

Action taken by the DNRE

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 U.S. Environmental Protection Agency (USEPA) 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 Mr. Christopher Ethridge, Acting Southeast Michigan 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 USEPA.



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**September 21, 2011 STAFF REPORT
ADDENDUM**

Purpose

A Staff Report dated August 15, 2011, 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 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:	Ivan Estereicher, Plant Manager 313-624-4282
AQD Contact:	Jonathan Lamb, Senior Environmental Quality Analyst 313-456-4683

Summary of Pertinent Comments

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