

State Registration
Number
N5997

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-N5997-2020a

**Granger Waste Management
Granger Meadows, LLC, Granger Land Development Company
Granger Container Service
Energy Developments Lansing, LLC**

Granger Wood Street Landfill

State Registration Number (SRN): N5997

Located at

16980 Wood Road, Lansing, Clinton and Ingham Counties, Michigan 48906

Permit Number: MI-ROP-N5997-2020a

Staff Report Date: July 6, 2020

Amended Date: May 23, 2022

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 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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State Registration Number

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RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-N5997-2020

July 6, 2020 STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act 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 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:	Granger Wood Street Landfill 16980 Wood Road Lansing, Michigan 48906
Source Registration Number (SRN):	N5997
North American Industry Classification System (NAICS) Code:	562212
Number of Stationary Source Sections:	3
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201700133
Responsible Official:	Mr. Keith Granger, Chief Executive Officer Granger Waste Services 517-372-2800 Mr. Todd Granger, Secretary Granger Waste Management Company 517-371-9717 Mr. Dan Zimmerman, Director North America HSE, Compliance & Operations Energy Developments Lansing, LLC 517-896-4417
AQD Contact:	Michelle Luplow, Environmental Quality Analyst 517-294-9294
Date Application Received:	October 20, 2017
Date Application Was Administratively Complete:	October 20, 2017
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	July 6, 2020
Deadline for Public Comment:	August 5, 2020

Source Description

The Granger Wood Street Landfill (GWSL), owned by Granger Land Development Company, is a municipal solid waste landfill with an associated gas-to-energy plant, Wood Street Generating Station, owned by Energy Developments Lansing, LLC (EDL), are both located at 16980 Wood Street in DeWitt Township (Clinton County) and Lansing Township (Ingham County), Michigan. Granger Container Service, owned by Granger Meadows and responsible for maintaining the fleet of waste disposal containers and gondolas, is also located at this site. Interstate I-127 borders the east side of the landfill property at less than a one-half mile. A combination of residential and industrial property borders the landfill to the west at a minimum distance of less than one quarter of a mile. A shopping center is located less than one quarter of a mile southeast of the landfill property. Residential neighborhoods are also located less than one-half of a mile to the northwest, northeast and south of the landfill property.

A landfill is defined as an area of land or an excavation in which wastes are placed for permanent disposal, and whose primary activity is to accept refuse for disposal. GWSL accepts municipal solid waste, consisting mostly of residential and commercial waste materials. The primary standard industrial code is 4953 (Municipal Solid Waste Landfill).

Natural biological decomposition occurring in landfills transform the waste's constituents into leachate and landfill gas. Decomposition is aerobic until the oxygen supply is exhausted. Anaerobic decomposition of buried refuse creates most of the landfill gas, which is predominantly methane, carbon dioxide, and nonmethane organic compounds (NMOC). The NMOC fraction consists of various organic hazardous air pollutants (HAPs), greenhouse gases, and volatile organic compounds (VOC). NMOC is the primary regulated air pollutant associated with landfill gas generation.

Solid waste arrives and is transported to an area (open cell) where it is deposited, and then is covered with soil or other approved alternate daily cover materials on a daily basis. When a cell reaches its design capacity, a liner is installed, covering the waste. The facility also accepts asbestos containing materials which are placed in areas designated specifically for regulated asbestos-containing material where it will not be disturbed. Asbestos waste is regulated under Title 40 of the Code of Federal Regulations (CFR) Part 61, Subpart M.

The GWSL consists of two landfill parcels: the Paulson Street Landfill and Wood Street Landfill. Granger purchased the Paulson Street Landfill in 1973 and continued with its operations until it stopped receiving waste in 1984 and constructed final cover in 1986 (under PA 641 operation and construction standards). The Granger Wood Street Landfill was installed July 16, 1984, which made the landfill subject to 40 CFR Part 62, Subpart GGG, as it commenced construction, reconstruction, or modification before May 30, 1991. Since this time, the landfill has received a volume expansion permit from the Department of Environment, Great Lakes and Energy (EGLE), making it subject to 40 CFR Part 60, Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills), instead of Subpart GGG. The landfill currently has a design capacity of 20.5 million megagrams (Mg), which exceeds the 2.5 million Mg and 2.5 million cubic meters threshold in Subpart GGG. Actual NMOC emissions are greater than 50 megagrams based upon Tier II test results established on May 23, and May 24, 2016, triggering the requirement to install a gas collection and control system (GCCS) under 40 CFR 60, Subpart WWW.

An active GCCS system was installed and operating prior to triggering the 50 Mg threshold. A GCCS design plan was required to be submitted and was received by EGLE on July 26, 2017, as required by 40 CFR 60.752(b)(2)(i). A final, approved GCCS design plan was received by EGLE on March 21, 2018. The GWSL was required to comply with the GCCS requirements by January 21, 2019, which included initiating monthly well monitoring and quarterly surface emissions monitoring. The current collection system covers both the Paulson Street and Wood Street Landfills and includes a series of gas wells; a network of collection piping and headers; and condensate drains and is periodically modified by adding a gas well and/or collection piping as needed when sections of the landfill begin to produce significant gas quantities.

The Wood Street Generating Station operates three permitted Caterpillar 3520 reciprocating internal combustion engines (RICE), each rated at 2,233 hp and four permitted 3516 RICE rated at 1,138 hp, for combusting the landfill gas collected by the GCCS. A 1,300 standard cubic feet per minute (scfm) candlestick flare, owned by GWSL, is also used to control any landfill gas that is not combusted in the landfill gas RICE.

Changes from Previous ROP

During this renewal, the ROP has been divided into three sections: Section 1 for the GWSL, Section 2 for Granger Container Service, and Section 3 for the Wood Street Generating Station to delineate the change in ownership of the Wood Street Generating Station from Granger Land Development to EDL.

EUTREATMENTSYS, EUOPENFLARE and EUACTIVECOLL emission units were added to the ROP as a result of the GWSL becoming subject to the requirements for a GCCS.

EUDIESEL-2 was removed from the ROP and included within the Staff Report instead because it was determined during this renewal that EUDIESEL-2 is not subject to the NSPS Subpart Kb.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2017**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	291.5
Lead (Pb)	0.0
Nitrogen Oxides (NO _x)	112.9
Particulate Matter (PM)	22.6
Sulfur Dioxide (SO ₂)	114.3
Volatile Organic Compounds (VOCs)	72.0

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2017 by the company:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Formaldehyde	39.1
Total Hazardous Air Pollutants (HAPs)	39.1

**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 sources are located in Clinton and Ingham Counties, which are currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to 40 CFR Part 70, because of the following: the potential to emit of CO, NO_x, and SO₂ exceeds 100 tons per year; the potential to emit of the single HAP, formaldehyde, regulated by the federal Clean Air Act, Section 112, is equal to or more than 10 tons per year and the potential to emit of all HAPs combined is equal to or more than 25 tons per year; and EULANDFILL is subject to 40 CFR, Part 60, Subpart WWW for Municipal Solid Waste Landfills that commenced construction, reconstruction or modification on or after May 30, 1991, which requires that a Part 70 Renewable Operating Permit (ROP) be submitted for all new and existing landfills with a design capacity equal to or exceeding 2.5 million Mg and 2.5 million cubic meters.

The stationary source is an existing Prevention of Significant Deterioration (PSD) source due to the potential to emit of greater than 250 tpy of any regulated air pollutant. No emission units at the stationary source have been subject to the PSD regulations in the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality or 40 CFR 52.21 because at the time of permitting the potential to emit of CO was less than 250 tpy.

Although EUICE1, EUICE2, EUICE3, and EUICE4 were installed after August 15, 1967, this equipment was exempt from New Source Review (NSR) permitting requirements at the time they were installed under Rule 336.1285(2)(g) and are therefore not permitted; however, future modifications of this equipment may be subject to NSR.

EUICEENGINE5, EUICEENGINE6, and EUICEENGINE7 at the stationary source are subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and JJJJ.

EULANDFILL and EUASBESTOS at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Municipal Solid Waste Landfills promulgated in 40 CFR Part 63, Subparts A and AAAA.

EUASBESTOS at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Asbestos promulgated in 40 CFR Part 61, Subparts A and M.

EUICE1, EUICE2, EUICE3, EUICE4, EUICEENGINE5, EUICEENGINE6, EUICEENGINE7, at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ. EUICE1-4 are existing RICE units; EUICEENGINE5-7 are new RICE units.

Violation notices were issued to GWSL and EDL on October 16, 2019 for Rule 201, as a result of increases in gas sulfur content without obtaining a permit to install for the increase. An escalated compliance notice was issued to EDL on December 20, 2019. A Schedule of Compliance is included in Appendix 3-2 of the ROP to address issues of noncompliance.

The AQD's Rules 287 and 290 were revised on December 20, 2016. FGRULE287(2)(c) and FGRULE290 are flexible group tables created for emission units subject to these rules. Emission units installed before December 20, 2016, can comply with the requirements of Rule 287 and Rule 290 in effect at the time of installation or modification as identified in the tables. However, emission units installed or modified on or after December 20, 2016, must comply with the requirements of the current rules as outlined in the tables.

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 stationary source is not subject to the federal Compliance Assurance Monitoring (CAM) rule (40 CFR 64) because the emission limitations or standards for MSW landfills are covered by 40 CFR 63, Subpart AAAA. Thus MSW landfills are exempt from CAM requirements.

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-N5997-2013 are identified in Appendix 6 of the ROP.

PTI Number			
357-07A	357-07		

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
EULIGHTPLANT-1	Two 27,000 Btu/hr diesel-fired light plants	R 336.212(4)(d)	R 336.285(2)(g)
EUCOMPRESSOR-1	Campbell Hausfield 12,722 Btu/hr, 5 hp, 80-gallon gasoline-fired compressor	R 336.212(4)(d)	R 336.285(2)(g)
EUGENERATOR-1	Five 34,121 BTU/hr diesel-fired generators	R 336.212(4)(d)	R 336.285(2)(g)
EUGASTANK-1	275-gallon above ground gasoline tank associated with EUCOMPRESSOR-1	R 336.212(4)(c)	R 336.284(2)(g)(i)
EUTUBEHEATER-2	Twenty natural gas-fired Re-Vaber-Ray tube radiant heaters used to provide heat to maintenance facilities	R 336.212(4)(b)	R 336.282(2)(b)(i)
EUSPACEHEATER-2	Six natural gas-fired space heaters	R 336.212(4)(b)	R 336.282(2)(b)(i)

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUVENTILATION-2	Six natural gas-fired make-up air heating ventilation units at 1.57 MMBtu/hr	R 336.212(4)(b)	R 336.212(4)(b)
EUCOMPRESSOR-2	2 Gardner Denver air compressors at 56,000 Btu/hr	R 336.212(4)(d)	R 336.285(2)(g)
EUSANDBLAST-2	Sandblasting unit	R 336.212(4)(d)	R 336.285(2)(l)(vi)(A)
EUDIESEL-2	15,000-gallon diesel tank	R 336.212(4)(c)	R 336.284(2)(g)(i)
EUTUBEHEATER	Ten natural gas-fired tube heaters at 360,000 Btu/hr or less used for space heating	R 336.212(4)(b)	R 336.282(2)(b)(i)
EUCOMPRESSOR	Saylor-Beall Air compressor, 14,000 Btu/hr	R 336.212(4)(d)	R 336.285(2)(g)
EUHEATER	Natural gas-fired furnace at 688,500 Btu/hr for space heating	R 336.212(4)(d)	R 336.282(2)(b)(i)

Draft ROP Terms/Conditions Not Agreed to by Applicant

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

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements 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 the 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 Brad Myott, Lansing District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number
N5997

RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-N5997-2020

August 10, 2020 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated July 6, 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 Officials:	Mr. Keith Granger, Chief Executive Officer 517-372-2800 Mr. Todd Granger, Secretary 517-371-9717 Mr. Dan Zimmerman, Compliance Manager 517-896-4417
AQD Contact:	Michelle Luplow, Environmental Quality Analyst 517-294-9294

Summary of Pertinent Comments

Granger Wood Street Landfill staff clarified the following and requested that Page 1 of the ROP be corrected to reflect this information:

- Wood Street Landfill is owned by “Granger Waste Management” and “Granger Meadows, LLC”
- Paulson Street Landfill (closed landfill at this stationary source) is owned by “Granger Land Development Company”
- Granger Container is owned by “Granger Container Service”

This information is also contained in the staff report and is used to correct inconsistencies in ownership described under the “Source Description” of this Staff Report.

EDL staff clarified the following and requested these changes be made in the ROP:

- EUICE1, EUICE2, EUICE3 and EUICE4 are rated at 1,148 bhp, rather than 1,138 bhp. Correct the Emission Unit Summary Table for each emission unit and the FGICE Description where 1,138 bhp is referenced.

The 1,138 bhp is also listed in the Staff Report “Source Description.” The above information is used to correct the inconsistency contained in the Staff Report for these emission units and flexible group.

EDL also notes a correction to the “General Information” table of the Staff Report: a title change for Dan Zimmerman, Responsible Official for EDL. Correct job title is “Compliance Manager” and this change has been reflected in this addendum under the “General Information” table.

Changes to the July 6, 2020 Draft ROP

Based on the information contained in this Staff Report’s “Summary of Pertinent Comments,” page 1 of the ROP was updated to include “Granger Land Development Company” and “Granger Container Service” to the list of owners to which the ROP will be issued.

EUICE1, EUICE2, EUICE3, EUICE4 and FGICE descriptions have been corrected to reflect correct brake horsepower of 1,148.

State Registration Number
N5997

RENEWABLE OPERATING PERMIT
May 23, 2022 - STAFF REPORT FOR RULE 217(2)
REOPENING

ROP Number
MI-ROP-N5997-2020a

Purpose

On October 7, 2020, the Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-N5997-2020 to Granger Wood Street Landfill pursuant to Rule 214 of the Michigan Air Pollution Control Rules. Once issued, the AQD is required to reopen the ROP if the criteria described in Rule 217 are met. Only those conditions to be added or changed in the ROP are to be considered during this public comment period. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 217.

General Information

Responsible Officials:	Mr. Keith Granger, Chief Executive Officer 517-372-2800 Mr. Todd Granger, Secretary 517-271-9717 Mr. Rocky Tondo, Head of Project Delivery and Technical Services 330-728-5266
AQD Contact:	Michelle Luplow, Environmental Quality Analyst 517-294-9294
Date Public Comment Begins:	May 23, 2022
Deadline for Public Comment:	June 22, 2022

Regulatory Analysis

The AQD has determined that the ROP must be reopened in order to remove obsolete requirements related to 40 CFR Part 60, Subpart WWW and 40 CFR Part 63, Subpart AAAA, and to add new applicable requirements associated with 40 CFR Part 62, Subpart OOO and 40 CFR Part 63, Subpart AAAA.

This ROP previously contained requirements to ensure compliance with 40 CFR Part 60, Subpart WWW for Municipal Solid Waste Landfills with NMOC emissions greater than 50 megagrams per year combined with 40 CFR Part 63, Subpart AAAA requirements. On June 21, 2021, the facility became subject to the Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014, and Have Not Been Modified or Reconstructed Since July 17, 2014 as specified in 40 CFR Part 62, Subpart OOO. The landfill is considered a legacy landfill under the Federal Plan. For 40 CFR Part 63, Subpart AAAA, new applicable provisions per 40 CFR 63.1930(b) apply after September 28, 2021. The permittee has opted to comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961) for a Municipal Solid Waste Landfill with a gas collection and control system used to comply with the provisions of the Federal Plan.

Description of Changes to the ROP

Section 1 Changes:

The Emission Unit Summary Table was updated to incorporate the Flexible Group ID's related to 40 CFR Part 62, Subpart OOO and 40 CFR Part 63, Subpart AAAA. The special conditions for emission units EULANDFILL, EUACTIVECOLL, and EUOPENFLARE were removed and replaced with the following respective flexible groups: FGLANDFILL-OOO, FGLANDFILL-AAAA, FGACTIVECOLL-OOO, FGACTIVECOLL-AAAA, FGOPENFLARE-OOO, FGOPENFLARE-AAAA.

The Flexible Group Summary table and special conditions were updated to incorporate the aforementioned flexible groups.

EUASBESTOS underlying applicable requirements (UARS) were updated from 40 CFR Part 60, Subpart WWW to the functionally identical requirements from 40 CFR Part 62, Subpart OOO in Special Conditions IV.1 and VI.3.

Appendix 7-1 was updated to remove outdated 40 CFR Part 60, Subpart WWW and 40 CFR Part 63, Subpart AAAA requirements and to incorporate the appropriate emission calculations for 40 CFR Part 62, Subpart OOO and 40 CFR Part 63, Subpart AAAA.

Appendix 6-1 was updated to include the correct language for addressing Permits to Install and the Source-Wide Permit to Install as necessary.

Section 2 Changes:

Appendix 6-2 was updated to include the correct language for addressing Permits to Install and the Source-Wide Permit to Install as necessary.

Section 3 Changes:

The Emission Unit Summary Table was updated to incorporate the Flexible Group ID's related to 40 CFR Part 62, Subpart OOO and 40 CFR Part 63, Subpart AAAA for EUTREATMENTSYS. The emission unit EUTREATMENTSYS was removed and replaced with FGTREATMENTSYS-OOO and FGTREATMENTSYS-AAAA.

The Flexible Group Summary table was updated to incorporate FGTREATMENTSYS-OOO and FGTREATMENTSYS-AAAA, and special conditions for FGTREATMENTSYS-OOO and FGTREATMENTSYS-AAAA were added.

Flexible group FGICEENGINES had to remain as is and cannot currently be edited to remove obsolete conditions because the conditions were established through the New Source Review (NSR) / Permit to Install (PTI) process.

Appendix 6-3 was updated to include the correct language for addressing Permits to Install and the Source-Wide Permit to Install as necessary.

Action Taken by the Department

The AQD proposes to approve this change to ROP No. MI-ROP-N5997-2020, which was reopened by the AQD to incorporate new applicable requirements associated with 40 CFR Part 62, Subpart OOO and 40 CFR Part 63, Subpart AAAA. 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 Brad Myott, Lansing 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
N5997

RENEWABLE OPERATING PERMIT
June 23, 2022 - STAFF REPORT ADDENDUM FOR
RULE 217(2) REOPENING

ROP Number
MI-ROP-N5997-2020a

Purpose

A Staff Report dated May 23, 2022, was developed to set forth the applicable requirements and factual basis for the draft reopening to Renewable Operating Permit's (ROP) terms and conditions as required by Rule 214(3) 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 reopening during the 30-day public and affected state(s) comment period as described in Rule 214(3) and (4). In addition, this addendum describes any changes to the proposed ROP reopening resulting from these pertinent comments.

General Information

Responsible Officials:	Mr. Keith Granger, Chief Executive Officer 517-372-2800 Mr. Todd Granger, Secretary 517-271-9717 Mr. Rocky Tondo, Head of Project Delivery and Technical Services 330-728-5266
AQD Contact:	Michelle Luplow, Environmental Quality Analyst 517-294-9294

Summary of Pertinent Comments

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

Changes to the May 23, 2022 Draft ROP Reopening

No changes were made to the draft ROP reopening.