

State Registration Number
B4072

RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-B4072-20XX

MARCH 12, 2019 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated February 4, 2019, 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

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| Responsible Official: | Tom Shannon, Mill Manager 269-969-7122 |
| AQD Contact: | Matt Deskins, Environmental Quality Analyst 269-567-3542 |

Summary of Pertinent Comments

The United States Environmental Protection Agency (EPA) has reviewed the draft Renewable Operating Permit (ROP) renewal for WestRock California, LLC (State Registration Number B4072), located in Battle Creek, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

EPA Comment 1: EU-FIRE-PUMP-ENGINE. Please verify whether this unit is subject to the Maximum Available Control Technology (MACT) for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63 Subparts A and ZZZZ), and include any applicable requirements and regulatory citations as appropriate, in accordance with 40 CFR 70.6(a)(1). Please note that 40 CFR 63.6590(c) provides that any affected MACT Subpart ZZZZ source meeting the criteria in 40 CFR 63.6590(c) is subject to 40 CFR Part 60, Subpart IIII for compression ignition engines (or 40 CFR Part 60, Subpart JJJJ, for spark ignition engines). Subpart IIII requirements are currently included in EU-FIRE-PUMP-ENGINE.

AQD Response: Under Section IX. "Other Requirements" of EU-FIRE-PUMP-ENGINE, a statement was added indicating that the emission unit was also subject to 40 CFR Part 63, Subpart ZZZZ. However; subsection 63.6590(c) provides that any affected Subpart ZZZZ source meeting the criteria in subsection 63.6590(c) is subject to 40 CFR Part 60, Subpart IIII which is the New Source Performance Standards (NSPSP for Compression Ignition Engines. Therefore, compliance with Subpart ZZZZ is accomplished by complying with the applicable requirements of Subpart IIII.

EPA Comment 2: FG-BOILERS. Section IX includes a table with requirements from the Industrial, Commercial, and Institutional Boilers Area Sources MACT (40 CFR Part 63, Subparts A and JJJJJJ). To ensure that the permit includes all currently applicable Subpart JJJJJJ requirements, in accordance with 40 CFR 70.6(a)(1), please consider updating FG-BOILERS to be consistent with MDEQ's MACT permit content templates.

AQD Response: An updated AQD Boiler MACT Template was used to replace the existing one contained in the Draft ROP for FG-BOILERS. Any conditions that were established pursuant to the New Source Review PTI that had been issued were incorporated where applicable and certain conditions were also deleted if they had already been completed and/or were non-applicable to the source.

Changes to the February 4, 2019 Draft ROP

A statement was added to EU-FIRE-PUMP-ENGINE indicating that the emission unit was also subject to 40 CFR Part 63, Subpart ZZZZ and an updated AQD Boiler MACT Template was used to replace the existing one contained in the Draft ROP for FG-BOILERS.