

State Registration Number  
N0677

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N0677-  
2020

**Steelcase Inc., Kentwood Complex**

State Registration Number (SRN): N0677

Located at

5353 Broadmoor Avenue SE, Kentwood, Kent County, Michigan 49512

Permit Number: MI-ROP-N0677-2020

Staff Report Date: August 17, 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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State Registration Number

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MI-ROP-N0677-  
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**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:                          | Steelcase Inc., Kentwood Complex<br>901 44 <sup>th</sup> Street<br>Grand Rapids, Michigan 49508 |
| Source Registration Number (SRN):                           | N0677   |
| North American Industry Classification System (NAICS) Code: | 337214  |
| Number of Stationary Source Sections:                       | 4   |
| Is Application for a Renewal or Initial Issuance?           | Renewal   |
| Application Number:   | 201900097   |
| Responsible Official Section 1:                             | Dean Watkins, Plant Manager<br>616-292-9219   |
| Responsible Official Sections 2 & 3:                        | Robert Krestakos, VP, Global Operations<br>616-291-6923   |
| Responsible Official Section 4:                             | David McLenithan, Plant Manager<br>256-777-0788   |
| AQD Contact:  | April Lazzaro, Senior Environmental Quality Analyst<br>616-558-1092                             |
| Date Application Received:                                  | May 31, 2019  |
| Date Application Was Administratively Complete:             | May 31, 2019  |
| Is Application Shield in Effect?                            | Yes   |
| Date Public Comment Begins:                                 | August 17, 2020   |
| Deadline for Public Comment:                                | September 16, 2020  |

## Source Description

Steelcase Inc., Kentwood Complex is a furniture company that manufactures a range of architecture, furniture and technology products and services for office environments as well as the education, health care and retail industries. Each of the sections is located within industrial or commercial areas.

| SECTION | NAME                                 | FACILITY ADDRESS             |
|---------|--------------------------------------|------------------------------|
| 1       | Kentwood West                        | 4350 52 <sup>nd</sup> Street |
| 2       | Energy Center                        | 4382 52 <sup>nd</sup> Street |
| 3       | Kentwood Seating & Non-Manufacturing | 4384 52 <sup>nd</sup> Street |
| 4       | Wood Furniture                       | 4100 68 <sup>th</sup> Street |

The Kentwood West facility is identified in Section 1 of the Renewable Operating Permit (ROP) and located at 4350 52<sup>nd</sup> Street, Kentwood, Michigan. The activities in Kentwood West include fabricating, powder coating and assembly of metal office furniture. The fabrication process employs sheet steel machining, shears, punches, notchers, presses, brakes, sanders, drills and welders. These fabricated parts are coated with powder coat then assembled into a final product. The Kentwood West facility also houses a paint booth exempt from permitting pursuant to Rule 287(2)(c).

The Energy Center facility is identified in Section 2 of the ROP and is located at 4382 52<sup>nd</sup> Street, Kentwood, Michigan. The equipment at the Energy Center includes four natural gas fired boilers. Boiler 1 is a natural gas-fired boiler with a maximum heat input rate of 43.2 MMBTU/hr and a maximum steam production rate of 30,000 lb/hr. Boiler 2 is a natural gas-fired boiler with a maximum heat input capacity of 48 MMBTU/hr and a maximum steam production rate of 40,000 lb/hour. Boiler 1 and Boiler 2 are exempt from permitting pursuant to Rule 282(2)(b). Boiler 4 is a natural gas-fired boiler with a maximum heat input rate of 90 MMBTU/hr and a maximum steam production rate of 70,000 lb/hr.

The Kentwood Seating & Non-Manufacturing operations are identified in Section 3 of the ROP and are located at 4384 52<sup>nd</sup> Street, Kentwood, Michigan. The activities in the Non-Manufacturing operations include the activities found at the Physical Distribution Center and the Fleet Facility. Within those facilities, activities include manufacturing support services including research and development, maintenance, shipping and receiving, warehousing and fleet maintenance. The Physical Distribution Center also houses a manufacturing subset named Kentwood Seating that conducts light assembly and operates a low volume paint booth exempt from permitting pursuant to Rule 287(2)(c).

The Wood Furniture plant is identified in Section 4 of the ROP and is located at 4100 68<sup>th</sup> Street, Caledonia, Michigan. The activities in the Wood Furniture facility include the manufacturing of wood office furniture which is comprised of woodworking equipment, wood finishing lines and adhesive stations. The wood finishing lines are the High Volume Stain, High Volume Clear, Low Volume Stain, Low Volume Clear, Work Surface, Roll Coat, Hang Line, Special Line and Adhesive Line. Coatings applied are stains, washcoats, tiecoats, topcoats, sealers, fillers, glazes and lacquers. Exhaust from the manual spray booths are vented through dry fabric filters for particulate removal. All water wash particulate control systems at the Wood Furniture plant have been replaced with dry fabric filters. The woodworking equipment consists of carving, cutting, routing, turning, drilling, sawing, sanding, planing and buffing wood components. The particulate from the wood working equipment is collected and exhausted through one of the seven baghouses.

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment have emission limits covered in the Source-Wide Conditions at the beginning of each section of the ROP.

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)               | 11.1          |
| Lead (Pb)                          | 0.000065      |
| Nitrogen Oxides (NO <sub>x</sub> ) | 13.2          |
| Particulate Matter (PM)            | 4.1           |
| Sulfur Dioxide (SO <sub>2</sub> )  | 0.08          |
| Volatile Organic Compounds (VOCs)  | 5.2           |

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2019 by Steelcase Inc., Kentwood Complex:

| Individual Hazardous Air Pollutants (HAPs) ** | Tons per Year |
|---|---------------|
| Hexane  | 0.22          |
| Triethylamine                                 | 0.54          |
| Glycol Ethers                                 | 0.24          |
| <b>Total Hazardous Air Pollutants (HAPs)</b>  | <b>1.06</b>   |

\*\*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 Kent 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 of NO<sub>x</sub> and SO<sub>2</sub> exceeds 100 tons per year based on emission limits established in the ROP.

The stationary source is a “synthetic minor” source regarding HAP emissions because the stationary source accepted a legally enforceable permit condition limiting the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, to less than 10 tons per year and the potential to emit of all HAPs combined to less than 25 tons per year.

The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations of 40 CFR 52.21 because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of NO<sub>x</sub> and SO<sub>2</sub> to less than 250 tons per year.

Changes to this ROP during the renewal process included the removal of sections of the permit for facilities that are no longer owned by Steelcase Inc., Kentwood Complex. This includes the location formerly known as the Computer Furniture Facility and the location formerly known as the Kentwood East Plant. Due to the removal of these facilities, the section names and numbers have been updated. The current configuration is the following: Section 1- Kentwood West, Section 2- Energy Center, Section 3- Kentwood Seating & Non-Manufacturing Facilities and Section 4- Wood Furniture.

Through a previous Permit to Install and subsequent modification to the ROP, the stationary source incorporated synthetic minor limits for NO<sub>x</sub> and SO<sub>2</sub> for PSD and Individual and Aggregate HAPs limits for area source applicability. The synthetic minor limits were in place prior to the effective date of the major source Boiler MACT promulgated in 40 CFR Part 63, Subpart DDDDD and as such is not subject. The source is not subject to the area source Boiler MACT under 40 CFR Part 63, Subpart JJJJJJ because the regulations do not apply to natural gas-fired (only) units.

## Section 1

Significant changes have occurred in Section 1- Kentwood West with this permit renewal. The owner/operator of Steelcase Inc., Kentwood Complex has requested removal of the provisions of the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Metal Furniture promulgated in 40 CFR Part 63, Subpart RRRR with this ROP renewal. The stationary source accepted a legally enforceable permit condition limiting the potential to emit of HAPs to below major source thresholds. The AQD is processing the request but recognizes that USEPA's withdrawal of its "once in, always in" policy is being challenged in court.

The solvent based cold cleaners have been removed from this location and the respective Flexible Group table has been removed from the permit.

The stationary source is no longer subject to the New Source Performance Standards for Metal Furniture promulgated in 40 CFR Part 60, Subpart EE because they no longer use any organic coatings on metal, and powder coatings are expressly excluded.

EUKWW-MT-EMG-GEN at the stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE Area Source MACT). The ROP contains special conditions for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ. The AQD is not delegated the regulatory authority for this area source MACT.

## Section 2

Significant changes have occurred in Section 2- Energy Center with this permit renewal. The solvent based cold cleaner has been removed from this location and the respective Flexible Group table has been removed from the permit. The Rule 290 Flexible Group table has also been removed.

During the renewal process, Steelcase Inc., Kentwood Complex provided a detailed Rule 278 demonstration which identified that EU EC-BOILER1 and EU EC-BOILER2 are exempt from permitting pursuant to Rule 282(2)(b) because both boilers have a heat input capacity of not more than 50,000,000 BTU per hour and neither boiler has the capability to burn alternate fuels. As a result, conditions that originated in a Permit to Install for EU EC-BOILER1 and EU EC-BOILER2 were removed from the permit. EU EC-BOILER4 requirements remain in the permit unchanged. The boilers are not subject to the area source Boiler MACT under 40 CFR Part 63, Subpart JJJJJJ because the standard does not regulate natural gas-fired (only) units. The stationary source became a "synthetic minor" source for HAP emissions prior to the effective date of January 31, 2016, and the boilers are not subject to 40 CFR Part 63, Subpart DDDDD.

Boiler 3 is a coal-fired boiler that has been decommissioned and rendered inoperable by a permanent physical change which prevents the boiler from operating and has been removed from the ROP in this renewal. The equipment remains in the building that comprises the Energy Center since it is cost prohibitive to remove it entirely at this time. The ROP contains Source-Wide conditions that originated in a Permit to Install that prohibit the use of coal at the stationary source.

EUEC-DIE-GENER at the stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE Area Source MACT). The ROP contains special conditions for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ. The AQD is not delegated the regulatory authority for this area source MACT.

### Section 3

Minor changes have occurred in Section 3- Kentwood Seating & Non-Manufacturing Facilities with this permit renewal. The solvent based cold cleaners have been removed from this location and the respective Flexible Group table has been removed from the permit. The Rule 290 Flexible Group table has also been removed. Clarification on the Emission Unit name and location of the Rule 287(2)(c) exempt paint booth has been incorporated. Also, to better describe the name of the section, Kentwood Seating was added to the name because some light manufacturing of furniture is conducted. The Kentwood Seating operations are located within the Physical Distribution Center building.

EUKW-MT-EMG-GEN-FLT-NG, EUKW-MT-EMG-GEN-PDC and EUFPH-FIRE-PUMP at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE Area Source MACT). The ROP contains special conditions for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ.

### Section 4

Significant changes have occurred in Section 4- Wood furniture with this permit renewal. EUWOOD-BOILER1 and EUWOOD-BOILER2 are subject to the New Source Performance Standards (NSPS) for Small Industrial, Commercial and Institutional Steam generating units promulgated in 40 CFR Part 60, Subparts A and Dc. The requirements have been incorporated into the ROP.

Although the stationary source has taken synthetic minor limits for HAPs, Steelcase Inc., Kentwood Complex chooses to comply with the National Emission Standard for Hazardous Air Pollutants for Wood Furniture promulgated in 40 CFR Part 63, Subpart JJ. As such, the permit continues to include FGWOOD-NESHAPJJ which incorporates provisions of the national standard.

The facility is no longer subject to the Flexible Polyurethane Foam Production NESHAP promulgated in 40 CFR Part 63, Subpart III because they no longer manufacture flexible polyurethane foam products.

Permit to Install No. 180-17, which was issued for the seven baghouses located at the facility identified as EUWOOD-DC-1, EUWOOD-DC-2, EUWOOD-DC-3, EUWOOD-DC-4, EUWOOD-DC-5, EUWOOD-DC-7 and EUWOOD-DC-8, has been incorporated into the ROP. The seven baghouses had been previously removed from the ROP on the basis that each unit was exempt from permitting. This evaluation by the company was incorrect and the ROP was modified in error. The exact former permit conditions were reissued with a new Permit to Install for these baghouses, and as such no new source review evaluation was conducted. Compliance Assurance Monitoring applies to this flexible group as detailed below.

The ROP identified that all existing wood coating processes are exempt from permitting pursuant to either Rule 287(2)(c) or Rule 290. This version of the permit did not change that assessment. However, because they are exempt, the Stack/Vent Restrictions table was removed from the respective Flexible Group tables.

EUWOOD-DIESELGEN at the stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE Area Source MACT). The ROP contains special conditions for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ.

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."

EUWOOD-DC-1, EUWOOD-DC-2, EUWOOD-DC-3, EUWOOD-DC-4, EUWOOD-DC-5, EUWOOD-DC-7 and EUWOOD-DC-8 have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the units have potential pre-control emissions over the major source thresholds. Each baghouse is identified as an emission unit that controls a variety of woodworking equipment at the facility. The pre-control emissions were determined based on the uncontrolled emission rate and airflow of each baghouse. The airflow of EUWOOD-DC-1, EUWOOD-DC-3, EUWOOD-DC-5 and EUWOOD-DC-7 is 61,000 standard cubic feet per minute, and the air flow of EUWOOD-DC-2, EUWOOD-DC-4 and EUWOOD-DC-8 is 81,000 standard cubic feet per minute.

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? * |
|---------------------------------|--|-------------------------------|-------------------|---|--------------------------------------|--------|
| EUWOOD-DC-1                     | PM10/<br>0.137<br>pounds per<br>hour;<br>0.0005<br>lb/1,000 lbs<br>of exhaust<br>gases | 40 CFR<br>52.21(c)<br>and (d) | Baghouse          | Baghouse<br>pressure<br>drop (1-5"<br>H <sub>2</sub> O), Daily<br>visible<br>opacity<br>observation | FGWOOD-<br>WOODWORKING               | No     |
| EUWOOD-DC-2                     | PM10/<br>0.182<br>pounds per<br>hour;<br>0.0005<br>lb/1,000 lbs<br>of exhaust<br>gases | 40 CFR<br>52.21(c)<br>and (d) | Baghouse          | Baghouse<br>pressure<br>drop (1-5"<br>H <sub>2</sub> O), Daily<br>visible<br>opacity<br>observation | FGWOOD-<br>WOODWORKING               | No     |
| EUWOOD-DC-3                     | PM10/<br>0.137<br>pounds per<br>hour;<br>0.0005<br>lb/1,000 lbs<br>of exhaust<br>gases | 40 CFR<br>52.21(c)<br>and (d) | Baghouse          | Baghouse<br>pressure<br>drop (1-5"<br>H <sub>2</sub> O), Daily<br>visible<br>opacity<br>observation | FGWOOD-<br>WOODWORKING               | No     |
| EUWOOD-DC-4                     | PM10/<br>0.182<br>pounds per<br>hour;  | 40 CFR<br>52.21(c)<br>and (d) | Baghouse          | Baghouse<br>pressure<br>drop (1-5"<br>H <sub>2</sub> O), Daily                                      | FGWOOD-<br>WOODWORKING               | No     |

| Emission Unit/Flexible Group ID                    | Pollutant/Emission Limit   | UAR(s)                  | Control Equipment | Monitoring (Include Monitoring Range)   | Emission Unit/Flexible Group for CAM | PAM? * |
|--|--|-------------------------|-------------------|---|--------------------------------------|--------|
|  | 0.0005 lb/1,000 lbs of exhaust gases                             |                         |                   | visible opacity observation   |                                      |        |
| EUWOOD-DC-5  | PM10/0.137 pounds per hour; 0.0005 lb/1,000 lbs of exhaust gases | 40 CFR 52.21(c) and (d) | Baghouse          | Baghouse pressure drop (1-5" H <sub>2</sub> O), Daily visible opacity observation | FGWOOD-WOODWORKING                   | No     |
| EUWOOD-DC-7  | PM10/0.137 pounds per hour; 0.0005 lb/1,000 lbs of exhaust gases | 40 CFR 52.21(c) and (d) | Baghouse          | Baghouse pressure drop (1-5" H <sub>2</sub> O), Daily visible opacity observation | FGWOOD-WOODWORKING                   | No     |
| EUWOOD-DC-8  | PM10/0.182 pounds per hour; 0.0005 lb/1,000 lbs of exhaust gases | 40 CFR 52.21(c) and (d) | Baghouse          | Baghouse pressure drop (1-5" H <sub>2</sub> O), Daily visible opacity observation | FGWOOD-WOODWORKING                   | No     |
| EUWOOD-DC-1, EUWOOD-DC-3, EUWOOD-DC-5, EUWOOD-DC-7 | PM10 and PM2.5/1.92 tpy  | 40 CFR 52.21(c) and (d) | Baghouse          | Baghouse pressure drop (1-5" H <sub>2</sub> O), Daily visible opacity observation | FGWOOD-WOODWORKING                   | No     |
| EUWOOD-DC-2, EUWOOD-DC-4, EUWOOD-DC-8              | PM10 and PM2.5/1.91 tpy  | 40 CFR 52.21(c) and (d) | Baghouse          | Baghouse pressure drop (1-5" H <sub>2</sub> O), Daily visible opacity observation | FGWOOD-WOODWORKING                   | No     |

\*Presumptively Acceptable Monitoring (PAM)

Continuous monitoring of baghouse pressure drop and conducting daily visible opacity operations will assure compliance with the PM10 emission limit.

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-N0677-2014a are identified in Appendix 6 of the ROP.

| PTI Number |          |         |         |
|------------|----------|---------|---------|
| 144-82     | 210-82*  | 36-85A* | 664-86A |
| 286-99*    | 286-99A* | 352-01* | 73-04*  |
| 73-04A*    | 79-15A   |         |         |

The use of an asterisk (\*) in this table denotes a PTI for which the ROP no longer contains conditions due to process changes.

**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 |
|-----------------------------|--|----------------------|-----------------------------|
| EUKWW-BAS-MTL-GCS           | Metal grinding, cutting, sanding, lube cooling                                 | R 336.1212(4)(d)     | R 336.1285(l)(vi)           |
| EUFC-TR-BOILER              | Fleet Center - Truck Repair WeilMcLain 3.1 MMBTU/hr natural gas fired boiler   | R 336.1212(4)(b)     | R 336.1282(b)(i)            |
| EUFC-TW-BOILER              | Fleet Center - Truck Wash WeilMcLain 1.7 MMBTU/hr natural gas fired boiler     | R 336.1212(4)(b)     | R 336.1282(b)(i)            |
| EUFC-TW-BOILER1             | Fleet Center - Truck Wash Tel. Laars 600,000 BTU/hr natural gas fired boiler 1 | R 336.1212(4)(b)     | R 336.1282(b)(i)            |
| EUFC-TW-BOILER2             | Fleet Center - Truck Wash Tel. Laars 600,000 BTU/hr natural gas fired boiler 2 | R 336.1212(4)(b)     | R 336.1282(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 as of the effective date of this ROP.

### **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 Heidi Hollenbach, Grand Rapids 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  
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**RENEWABLE OPERATING PERMIT**

ROP Number  
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2020

**September 17, 2020 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated August 17, 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 Section 1:      | Dean Watkins, Plant Manager<br>616-292-9219                         |
| Responsible Official Sections 2 & 3: | Robert Krestakos, VP, Global Operations<br>616-291-6923             |
| Responsible Official Section 4:      | David McLenithan, Plant Manager<br>256-777-0788                     |
| AQD Contact:                         | April Lazzaro, Senior Environmental Quality Analyst<br>616-558-1092 |

**Summary of Pertinent Comments**

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

**Changes to the August 17, 2020 Draft ROP**

No changes were made to the draft ROP.