

State Registration Number
A1991

RENEWABLE OPERATING PERMIT
NOVEMBER 15, 2021 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-A1991-2022

Purpose

A Staff Report dated September 27, 2021, 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:	James Justice, Senior Vice President of Corporate Responsibility and Resource Management 269-349-9711
AQD Contact:	Monica Brothers, Senior Environmental Quality Analyst 269-312-2535

Summary of Pertinent Comments

The following changes were made based on an October 27, 2021 discussion with USEPA and a following discussion with the facility.

Changes to the September 27, 2021 Draft ROP

EU41-EXT-02: Based on discussion with USEPA, on page 21, the condition under Section IX. OTHER REQUIREMENT(S), which states, "The permittee shall implement the Malfunction Abatement Plan when visible emissions are observed, as per requirement VI (1) of this table, (R 336.1213(3))" was moved to Section VI.

EUPDB063050: On page 22, "FGBOILERMACT" was removed from the Flexible Group ID because there is no longer an FGBOILERMACT in the ROP.

FGGRIND: Based on discussion with USEPA, on page 27, the condition under Section IX. OTHER REQUIREMENT(S), which states, "The Malfunction Abatement Plan for the baghouses shall be implemented when visible emissions are observed as per requirement VI (1) of this table. (R 336.1213(3))" was moved to Section VI.

FGCOMB: Based on discussion with the facility, on page 28, under POLLUTION CONTROL EQUIPMENT, "Scrubber tank (TK48125)" was changed to "Venturi Scrubber Hold Tank (TK48003)".

FGCOMB: On page 29, the following condition was added to Section III: "The permittee shall implement and maintain a Malfunction Abatement Plan (MAP), or an alternate plan approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner, the chilled coolant "tail condensers" during malfunction events, and a program for corrective action for such events. If the malfunction abatement plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall

revise the malfunction abatement plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor. **(R 336.1213(2), R 336.1911)**”

FGCOMB: Based on discussion with USEPA, on page 30, the condition under Section IX. OTHER REQUIREMENT(S), which states, “The Malfunction Abatement Plan for the chilled coolant “tail condensers” shall be implemented when the daily reading of the condenser gas outlet temperature exceeds 5°C.² **(R 336.1201, R 336.1911)**” was moved to Section VI.