

State Registration Number

P0668

RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-P0668-2019

AUGUST 13, 2019 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated July 8, 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

Responsible Official:	Thomas Carpenter, Executive Director 906-458-5765
AQD Contact:	Sydney Bruestle, Environmental Quality Analyst 906-236-3277

Summary of Pertinent Comments

Marquette Board of Light and Power Marquette Energy Center commented on FGNGOP Section V., Condition 3. Language from PTI 204-15A was added to the ROP requiring testing within 180 days of permit issuance. The facility completed the required testing within 180 days of the PTI issuance as the language required. This condition should be modified to require testing at least once every 5 years.

U.S. Environmental Protection Agency (EPA) commented the draft ROP did not properly address potentially applicable requirements pursuant to the Clean Air Act Acid Rain Program. It is likely that the source is subject to the new unit exemption provisions in 40 CFR 72.7.

Changes to the May 30, 2019 Draft ROP

FGNGOP Section V., Condition 3 was modified. Language requiring stack testing within 180 days of permit issuance was removed because this was intended to be completed within 180 days of the issuance of PTI 204-15A and was completed July 25, 2019. Language requiring stack testing at least every 5 years was added.

Marquette Board of Light and Power Marquette Energy Center is subject to the new unit acid rain permit exemption provisions in 40 CFR 72.2. Special Conditions IX. 4 & 5 were added to FGNGOP and FGDIESELOP to cover the requirements of 40 CFR 72.7.