

State Registration Number

B2103

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

MI-ROP-B2103-2014d

Detroit Water and Sewerage Department
Detroit Wastewater Treatment Plant

SRN: B2103

Located at

9300 West Jefferson Avenue, Detroit, Michigan 48209

Permit Number: MI-ROP-B2103-2014d

Staff Report Date: August 26, 2013

Amended Dates: June 13, 2014;
August 31, 2015;
December 15, 2015;
July 12, 2017

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 Michigan Department of Environmental Quality (MDEQ), 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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Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
B2103

RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-B2103-2014

AUGUST 26, 2013 STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a 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 report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit 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:	Detroit Water and Sewerage Department Detroit Wastewater Treatment Plant 9300 West Jefferson Avenue Detroit, Michigan 48209
Source Registration Number (SRN):	B2103
North American Industry Classification System (NAICS) Code:	221320
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200700053
Responsible Official:	Wendy Barrott, WWTP General Manager 313-297-0300
AQD Contact:	Stephen Weis, Senior Environmental Engineer 313-456-4688
Date Permit Application Received:	April 24, 2007
Date Application Was Administratively Complete:	October 3, 2007
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	August 26, 2013
Deadline for Public Comment:	September 25, 2013

Source Description

The City of Detroit Water and Sewerage Department Wastewater Treatment Plant (WWTP) is located along Jefferson Avenue in the southwest portion of the City of Detroit. The facility is located just north of the Rouge River, and most of the wastewater treatment operations are located west of Jefferson Avenue. The WWTP is located adjacent to primarily industrial properties, but there are residential neighborhoods in relatively close proximity. The City of River Rouge is located across the Rouge River from the WWTP, and the northern edge of the residential area in this city is just over ¼ mile south of the WWTP's southern property line. There are also residential areas in Detroit to the north and northwest of the northern portion of the WWTP, which contains the secondary treatment tanks, that are located less than 100 yards from the WWTP property line.

The WWTP collects and treats domestic and industrial wastewater from the Metro Detroit area. The facility receives wastewater via three (3) major interceptors – the Detroit River interceptor, which contains flow from Detroit; the Oakwood/Rouge interceptor, which directs flow from the west side of Detroit and western suburbs; and the North interceptor, which contains flow from Detroit's northern suburbs. The treatment capacity of the WWTP, or wet weather capacity, is 1.7 billion gallons per day primary treatment capacity, and 930 million gallons per day (MGD) secondary (activated sludge); the average dry weather flow is 750 MGD.

The wastewater treatment portion of the facility consists of a multitude of treatment tanks that provide primary and secondary treatment of wastewater influent to the WWTP. Many of these tanks are open to the atmosphere, and the presence of odorous material in the tanks could potentially cause an odor in the ambient air. However, the wastewater treatment processes, including the treatment tanks, are not permitted by the Air Quality Division as this type of equipment is exempt from air quality permitting requirements. The treatment process involves the removal of large solids using bar racks and grit chambers, primary and secondary biological treatment for the removal of suspended and dissolved solids, clarification, chlorination of water from secondary clarifiers, and sludge dewatering. Much of the sludge is incinerated via on-site multiple hearth incinerators, and the ash produced during the incineration process is disposed of in a sanitary landfill. The treated wastewater is discharged as effluent to Detroit River.

The primary sources of air emissions at the WWTP are the fourteen sewage sludge incinerators. The incinerators are located in two "Complexes" – Incinerators 1-6 are located in Complex I, while incinerators 7-14 are located in Complex II. The Complex I incinerators were built in the 1940's, while the Complex II incinerators, which are slightly larger multi-hearth incinerators, were built in the 1960's/1970's. Emissions from the incinerators are controlled by a series of scrubbers. The exhaust gases are pulled downward (via a breach) after being exhausted from the top of the incinerators by an induced draft fan, and directed through a venturi scrubber (flooded venturi throat); a flooded elbow; and an impingement tray-type scrubber. Each of the incinerators exhausts to a flue (stack). These flues are enclosed within three tall stacks. The six flues for incinerators Number 1- 6 are enclosed in Tall Stack #1, flues for incinerators 7-10 are enclosed in the Tall Stack II and flues for incinerators 11-14 are enclosed in Tall Stack III.

The process equipment and devices that generate emissions that are released to the ambient air at a facility are referred to as Emission Units for the purposes of the ROP. Among the Emission Units included in the ROP for the WWTP are the aforementioned sewage sludge incinerators, identified as FGCOMPLEX1 and FGCOMPLEX2 in the ROP; seventeen emergency generators identified as FGENGINES; four small boilers identified as FGNSPSBOILERS; the incinerator ash storage and conveying systems (FGC1ASH and FGC2ASH); lime storage operations (FGLIMESTORAGE); and the so-called lime pad, which is a process whereby treated sewage sludge is stabilized by being mixed with lime prior to being sent offsite for landfilling (requirements contained in EULIMEPAD).

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2012** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	2
Lead (Pb)	1.4
Nitrogen Oxides (NO _x)	274
Particulate Matter less than 10 microns (PM ₁₀)	4.5
Sulfur Dioxide (SO ₂)	55
Volatile Organic Compounds (VOCs)	55

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases in tons per year of CO_{2e} is greater than 100,000 tons per year. CO_{2e} is a calculation of the combined global warming potentials of six Greenhouse Gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

See Parts C and D in the draft 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 located in Wayne County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to the particulate matter standard. Specifically, on December 17, 2004 Wayne County was designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area for the particulate matter (PM_{2.5}) standard. Wayne County is currently designated as attainment/unclassified for all other 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 all criteria pollutants exceeds 100 tons per year. Also, the potential to emit of Greenhouse Gases is 100,000 tons per year or more calculated as carbon dioxide equivalents (CO_{2e}) and 100 tons per year or more on a mass basis.

The stationary source is subject to the Prevention of Significant Deterioration regulations of 40 CFR, Part 52.21 because the potential to emit of all criteria pollutants is greater than 100 tons per year; municipal incinerators (this source has municipally-owned sewage sludge incinerators) are one of the 28 source categories listed in Part 52.21(b)(1)(i)(a) for which the 100 ton per year threshold applies.

The fourteen sewage sludge incinerators and their associated incinerator ash conveying and storage systems (permit requirements identified under the Flexible Groups FGCOMPLEX1, FGCOMPLEX2, FGC1ASH and FGC2ASH) are subject to the New Source Performance Standards (NSPS) promulgated in 40 CFR, Part 60, Subparts A and M (Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units). This regulation applies to sewage sludge incinerators that

commenced construction on or before October 24, 2010; all of the incinerators at the facility were installed prior to this date.

There is another NSPS, Subpart O (Standards of Performance for Sewage Treatment Plants), that applies to some sewage sludge incinerators. Specifically, Subpart O applies to incinerators that combust wastes containing more than 10 percent sewage sludge produced by municipal sewage treatment plants, or incinerators that charge more than 1000 kg (2205 lb) of municipal sewage sludge per day. If a facility has incinerators that satisfy either of these criteria, Subpart O applies if the facility commenced construction or modification after June 11, 1973. The Complex 1 incinerators have been reported as being installed in 1940, while the Complex 2 incinerators are reported as being installed in 1970. Based on the applicability dates, Subpart O does not apply at this point in time. Subpart O limits emissions of particulate matter; the new NSPS (Subpart M) contains a stricter particulate matter limit, as well as emission limits and monitoring/testing requirements for several additional pollutants.

The facility is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for beryllium and mercury as promulgated in 40 CFR, Part 61, Subparts C and E, respectively. These requirements address these two pollutants as a concentration in the sewage sludge that is charged in the incinerators rather than in-stack. The mercury limitations put forth in 40 CFR, Part 60 Subpart M are stricter and were applied to the emissions from the incinerators, while the Part 61 requirements are found in the Source-Wide Conditions. The facility is also subject to 40 CFR 503, Standards for the Use or Disposal of Sewage Sludge, Subpart E, Incineration. However it is not included in the permit due to EPA's suggestion that this subpart is not a part of the Clean Air Act.

The four small boilers in FGNSPSBOILERS are subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in Title 40 of the Code of Federal Regulations (40 CFR), Part 60, Subparts A and Dc.

The seventeen generators in FGENGINES are subject to 40 CFR, Part 60, Subparts IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) and JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines), as well as 40 CFR Part 63, Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines). There is a high-level reference to these regulations in the FGENGINES permit condition table. Subpart JJJJ does not appear to apply to any of the natural gas-fired generators as they were all manufactured prior to the applicability trigger date of April 1, 2006. Five of the generators (EUGEN-D1A, EUGEN-D1B, EUGEN-D2, EUGEN-D5, EUGEN-D6) are specifically subject to the provisions of Subpart IIII. These five generators were grouped together in FGCIENGINES to allow for the provisions of Subpart IIII to be applied to the operation of this equipment.

The facility is subject to Chemical Accident Prevention Provisions, 40 CFR 68 approved under the Section 112(r) of Clean Air Act 1990 Amendments. The Compliance date of this rule for this facility is no later than June 21, 1999. Applicant submitted the plan on June 18, 1999.

There are currently two Consent Orders in effect at the facility. One of the Consent Orders is actually part of the State of Michigan's State Implementation Plan (SIP); this part of the SIP was submitted by the State of Michigan as part of the attainment demonstration for PM-10. The Michigan Department of Natural Resources submitted the PM-10 SIP to EPA on June 11, 1993, and, after a couple of revisions, the nonattainment area PM SIP for Wayne County, Michigan was approved and became effective on February 16, 1995. One element of the SIP was the requirement that facilities with designated standard industrial classifications that are located in the area designated in Table 36 of Michigan Administrative Rule 371 "...develop and implement an approved fugitive dust control operating program and to have the program embodied in a legally enforceable order..." (this quote was taken from the preamble to the Consent Order). Many of the larger facilities in the portion of Wayne County designated in Table 36 were issued Orders as part of the SIP. The WWTP was issued an Order referred to as SIP No. 11-

1993. The requirements of SIP No. 11-1993 are incorporated in the Source-Wide Conditions portion of the ROP.

The second Consent Order was issued by the MDEQ-AQD; this Order is designated as AQD No. 17-2006. This Order addressed nuisance particulate emissions from the WWTP, and required that the facility prepare and implement a malfunction abatement plan (MAP). The requirements of AQD No. 17-2006 are referenced in FGCOMPLEX1 and FGCOMPLEX2, and the required MAP is attached to the ROP as Appendix 9.

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. PTIs issued after the effective date of ROP No. 199600412 are identified in Appendix 6 of the ROP.

Equivalent Requirements

This permit does not include any equivalent requirements pursuant to Rule 212(5). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original PTI, a Consent Order/Judgment, and/or the State Implementation Plan.

Non-applicable Requirements

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

There were no processes listed in the ROP application as exempt devices under Rule 212(4). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

Draft ROP Terms/Conditions Not Agreed to by Applicant

The following table lists terms and/or conditions of the draft ROP that the AQD and the applicant did not agree upon and outlines the applicant's objections pursuant to Rule 214(2). The terms and conditions that the AQD believes are necessary to comply with the requirements of Rule 213 shall be incorporated into the ROP.

This permit 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 the DEQ

The AQD proposes to approve this permit. 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 U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit 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 Wilhemina McLemore, Detroit District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit 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.

Purpose

A Staff Report dated February 13, 2013 was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). 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 R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Wendy Barrott, WWTP General Manager 313-297-0300
AQD Contact:	Stephen Weis, Senior Environmental Engineer 313-456-4688

Summary of Pertinent Comments

AQD received comments from staff with the City of Detroit Water and Sewerage Department (DWSD), and from the EPA-Region 5 Air Permits Section during the 30-day public comment period. The comments, and AQD's response to the comments, are detailed below.

Comments received from DWSD staff:

Comment 1 – Source-Wide Conditions – V. Testing/Sampling (page 12 of draft ROP)

DWSD proposes to change the language relating to the 40 CFR Part 61 National Emission Standard for Mercury, as put forth in Subpart E.

AQD response:

The language proposed in the draft ROP was taken from DWSD's initial ROP; it is assumed that this language was put forth by DEQ-AQD, and agreed to by DWSD. The current language follows the requirements of 40 CFR 61.54 and 61.55. The change proposed by DWSD involves synching the mercury monitoring requirements (in the form of sludge/biosolids sampling) with those required by 40 CFR Part 503. While the language in the draft ROP requires that sludge sampling take place once every 12 month period, Part 503 requires that DWSD perform monthly sampling of sludge for various parameters, including mercury concentration. DWSD's proposal would involve more frequent monitoring of the sludge than is required by Subpart E.

DWSD also proposes that a limit of 8.77mg/kg be included as the trigger point for further monitoring. DWSD states that this mercury concentration was determined in accordance with 503.43(e). 40 CFR Part 503.43(b) states that "Firing of sewage sludge in a sewage sludge incinerator shall not violate the requirements in the National Emission Standard for Mercury in subpart E of 40 CFR part 61." As such, the 8.77 mg/kg limit, when applied with the maximum sludge feed rate of 77 dry tons per day for 16 incinerators (this feed rate is presented in the most recent Permit to Install applications), results in a daily mercury emission rate of 9801.81 grams/day, which is greater than the Part 61 Subpart E limits of

3,200 and 1,600 grams/day. As such, AQD suggests to adopt DWSD's suggested language, changing the mercury limit to 1.43 mg/kg (which corresponds to 1,600 grams/day), and requiring that DWSD notify the AQD District Supervisor whenever the monthly monitoring indicates a level in excess of 1.43mg/kg. Since the facility will still be performing monthly sludge sampling, the Method 105 monitoring requirements from Part 61 Subpart E will be met, and actually exceeded, with more frequent monitoring of the sludge.

Comment 2 – Source-Wide Conditions - IX. Other Requirements – 10. Fugitive Dust Control Plan (page 13 of draft ROP)

DWSD updated the surface area information relating to fugitive dust management.

AQD response:

These changes have been incorporated into Special Condition IX.10 of the Source-Wide Conditions section of the ROP.

Comment 3 – Emission Unit Summary Table (page 18 of draft ROP)

DWSD commented that all of the diesel-fired emergency engines should have FGCIENGINES included as a Flexible Group, and that FGENGINES should not be listed as an applicable Flexible Group.

AQD response:

All of these engines, along with the natural gas-fired engines, need to be included as part of the FGENGINES Flexible Group as they are included in PTI No. 252-06. The FGENGINES flexible group serves to incorporate the requirements of this PTI into the ROP. The FGCIENGINES Flexible Group only addresses diesel-fired engines that are subject to the requirements of 40 CFR Part 60, Subpart IIII.

Comment 4 – Emission Unit Summary Table (page 18 of draft ROP)

DWSD provided a corrected rating for the engine identified as EUGEN-D5.

AQD response:

The rating of engine EUGEN-D5 was corrected per DWSD's request from 1,500kW to 400kW.

Comment 5 – Flexible Group Summary Table (page 22 of draft ROP)

DWSD states that there are 3 storage silos associated with FGLIMESTORAGE, not 6 as identified in the draft ROP.

AQD response:

The lime storage silos identified as numbers 4-6 were included in the ROP renewal application, but it was also stated in the application that these silos/emission units had a dismantle date of 1/20/2005. The draft ROP has been modified to reflect that there are 3 lime storage silos (1-3) associated with FGLIMESTORAGE.

Comment 6 – Flexible Group Summary Table (page 22 of draft ROP)

DWSD requests that all of the diesel-fired engines be placed in FGCIENGINES, and only natural gas-fired engines be addressed by FGENGINES.

AQD response:

The FGENGINES flexible group addresses all 17 engines that were permitted by PTI No. 252-06. The purpose of FGENGINES is to incorporate the terms and conditions of PTI No. 252-06 into the ROP, so all 17 engines, both diesel and natural gas-fired, are included in FGENGINES. FGCIENGINES includes diesel-fired engines that are subject to the requirements of 40 CFR Part 60, Subpart IIII. Five of the seventeen engines are subject to Subpart IIII, and these engines are included in FGCIENGINES.

Comment 7 – Flexible Group Summary Table (page 22 of draft ROP)

DWSD states that the diesel-fired engine designated as EUGEN-D4 should be included as part of FGCIENGINES.

AQD response:

EUGEN-D4 is not subject to 40 CFR Part 60, Subpart IIII as it was not manufactured after 4/1/2006, or installed/modified/reconstructed after 7/11/2005. As previously mentioned, the FGCIENGINES flexible group serves to address diesel-fired engines that are subject to Subpart IIII. As EUGEN-D4 is not subject to Subpart IIII, it should not be included as part of FGCIENGINES.

Comment 8 – FGC1ASH, I. Emission Limit(s), 1. Particulate Matter (page 24 of draft ROP)

DWSD corrected the syntax for the underlying applicable requirement (Michigan Administrative Rule 331). DWSD also commented that the particulate matter emission limit per Rule 331 should be 0.2 pounds per 1,000 pounds exhaust air.

AQD response:

The Rule 331 citation was corrected per DWSD's suggestion. Also, the particulate matter emission limit was changed from 0.1 pounds per 1,000 pounds exhaust air to 0.2 pounds per 1,000 pounds exhaust air, as put forth in B.6 of Table 31 in Rule 331.

Comment 9 – FG1ASH, I. Emission Limit(s), 2. Visible Emissions (page 24 of draft ROP)

DWSD states that the time period/operating scenario relating to the visible emission limitation is not clear.

AQD response:

The Special Condition requires that DWSD determine the presence of visible emissions during three one hour observation periods. This requirement is put forth in 40 CFR Part 60, Subpart MMMM. However, there is no specific direction in Subpart MMMM, nor in EPA Method 22 (the method by which the opacity observations will be taken) as to how often the three one hour observation periods are to occur.

This issue was discussed with DWSD back on April 3, 2013. Via an e-mail of the same date, I suggested to DWSD that the opacity readings take place once per month. I further suggested that DWSD and DEQ should communicate regarding this issue when the ROP is issued and agree upon a frequency.

Comment 10 – FGC1ASH, V. Testing/Sampling, 1 (page 24 of the draft ROP)

DWSD identified a spelling error in the permit condition.

AQD response:

The spelling error identified by DWSD was corrected.

Comment 11 – FGC1ASH, V. Testing/Sampling, 2 (page 25 of draft ROP)

DWSD identified a grammatical error in the permit condition.

AQD response:

The grammatical error identified by DWSD was corrected.

Comment 12 – FGC1ASH, VI. Monitoring/Recordkeeping, Id (page 25 of the draft ROP)

DWSD is inquiring whether the requirement to perform the visible emission/opacity observations discussed earlier (comment 9) can be removed if a monitoring system is installed.

AQD response:

This issue will need to be discussed further, and details regarding the feasibility of installing an opacity monitor on this emission unit and the specifics of such an installation will need to be provided to AQD. For now, the permit condition will remain as presented in the draft.

Comment 13 – FGC2ASH, I. Emission Limit(s), 1. Particulate Matter (page 27 of draft ROP)

DWSD corrected the syntax for the underlying applicable requirement (Michigan Administrative Rule 331). DWSD also commented that the particulate matter emission limit per Rule 331 should be 0.2 pounds per 1,000 pounds exhaust air.

AQD response:

The Rule 331 citation was corrected per DWSD's suggestion. Also, the particulate matter emission limit was changed from 0.1 pounds per 1,000 pounds exhaust air to 0.2 pounds per 1,000 pounds exhaust air, as put forth in B.6 of Table 31 in Rule 331.

Comment 14 – FG2ASH, I. Emission Limit(s), 2. Visible Emissions (page 27 of draft ROP)

DWSD states that the time period/operating scenario relating to the visible emission limitation is not clear.

AQD response:

The Special Condition requires that DWSD determine the presence of visible emissions during three one hour observation periods. This requirement is put forth in 40 CFR Part 60, Subpart M. However, there is no specific direction in Subpart M, nor in EPA Method 22 (the method by which the opacity observations will be taken) as to how often the three one hour observation periods are to occur.

This issue was discussed with DWSD back on April 3, 2013. Via an e-mail of the same date, I suggested to DWSD that the opacity readings take place once per month. I further suggested that DWSD and DEQ should communicate regarding this issue when the ROP is issued and agree upon a frequency.

Comment 15 – FGC2ASH, V. Testing/Sampling, 1 (page 27 of the draft ROP)

DWSD identified a spelling error in the permit condition.

AQD response:

The spelling error identified by DWSD was corrected.

Comment 16 – FGC2ASH, V. Testing/Sampling, 2 (page 28 of draft ROP)

DWSD identified a grammatical error in the permit condition.

AQD response:

The grammatical error identified by DWSD was corrected.

Comment 17 – FGC2ASH, VI. Monitoring/Recordkeeping, 1d (page 28 of the draft ROP)

DWSD is inquiring whether the requirement to perform the visible emission/opacity observations discussed earlier (comments 9 and 14) can be removed if a monitoring system is installed.

AQD response:

This issue will need to be discussed further, and details regarding the feasibility of installing an opacity monitor on this emission unit and the specifics of such an installation will need to be provided to AQD. For now, the permit condition will remain as presented in the draft.

Comment 18 – FGCOMPLEX1, III.Process/Operational Restrictions, 2 (page 31 of draft ROP)

DWSD commented that the language addressing the combustion temperature range of the incinerators should be changed.

AQD response:

DWSD's suggested change (from "1100°F to 1500°F" to "1100°F and 1500°F") was made.

Comment 19 – FGCOMPLEX1, VI. Monitor/Recordkeeping, 8 (page 33 of draft ROP)

DWSD suggested a language change in this Special Condition.

AQD response:

The language "...serving and incinerator..." was changed to "...serving any incinerator...", which was the original intent.

Comment 20 – FGCOMPLEX2, I. Emission Limit(s) (pages 37-38 of draft ROP)

This comment addresses the language at the end of the Emission Limit table for FGCOMPLEX2. This language, which has been placed under the emission limits table, contains the language from 40 CFR Part 60, Subpart Mmmm, 60.5165. This paragraph in Subpart Mmmm puts forth the emission limits/standards that sewage sludge incinerators that are subject to Subpart Mmmm must comply with. The language in paragraph 60.5165 defines the times and operational conditions during which the emission limits apply. 60.5165 states that the limits apply to emissions from a bypass stack or vent at times when sewage sludge is in the combustion chamber.

40 CFR 60.5220(d) also addresses bypass stacks, stating that "...use of the bypass stack at any time that sewage sludge is being charged to the SSI unit is an emissions standards deviation...". This language is included in the draft ROP on page 38 as special condition III.4. DWSD states that they recognize that these conditions are part of a federal requirement, but they want to state their objection to the contradictory nature of these requirements.

AQD response:

No changes were requested based on this comment, so the language in the draft ROP will remain unchanged.

Comment 21 – FGCOMPLEX2, III.Process/Operational Restrictions, 2 (page 37 of draft ROP)

DWSD commented that the language addressing the combustion temperature range of the incinerators should be changed.

AQD response:

DWSD's suggested change (from "1100°F to 1500°F" to "1100°F and 1500°F") was made.

Comment 22 – FGCOMPLEX2, III. Process/Operational Restrictions, 4 (page 38 of the draft ROP)

DWSD commented that this Special Condition is a conflicting requirement.

AQD response:

This issue was addressed in the discussion for Comment 20 above. No change is made to the draft ROP based on this comment.

Comment 23 – FGCOMPLEX2, IV. Design/Equipment Parameter(s), 1a (page 38 of draft ROP)

DWSD is seeking clarification as to how often the control device inspection reference in special condition IV.1 should be conducted.

AQD response:

The control device inspection requirement, as put forth in 40 CFR 60.5195, is the initial control device inspection that needs to be completed by the compliance date of Subpart Mmmm. This inspection is not a regularly-occurring inspection, but rather the inspection that will serve to initially demonstrate compliance with the provisions in Subpart Mmmm requiring that the control devices be properly maintained and in good operational condition. As such, there is no specific frequency associated with the inspection requirement in special condition IV.1/40 CFR 60.5195; this condition and regulatory requirement simply address the initial demonstration that any air pollution control devices are being maintained for proper operation via an inspection.

40 CFR 60.5200 is referenced in special condition IV.1. This portion of Subpart Mmmm does require the implementation of a site-specific monitoring plan for each continuous monitoring system. This requirement is included in the draft ROP as special condition VI.5 under Monitoring/Recordkeeping.

Comment 24 – FGCOMPLEX2, VI. Monitor/Recordkeeping, 8 (page 39 of draft ROP)

DWSD suggested a language change in this Special Condition.

AQD response:

The language "...serving and incinerator..." was changed to "...serving any incinerator...", which was the original intent.

Comment 25 – FGENGINES, Description (page 44 of draft ROP)

DWSD comments that this flexible group should only be for natural gas-fired engines. DWSD requests that all of the diesel-fired engines be placed in FGCIENGINES, and only natural gas-fired engines be addressed by FGENGINES.

AQD response:

As mentioned in reference to some earlier comments, the FGENGINES flexible group addresses all 17 engines that were permitted by PTI No. 252-06. The purpose of FGENGINES is to incorporate the terms and conditions of PTI No. 252-06 into the ROP. Thus, all 17 of the engines addressed by PTI 252-06 need to be included in this flexible group.

Comment 26 – FGENGINES, III. Process/Operational Restriction(s), 1 (page 44 of draft ROP)

DWSD comments that this requirement only applies to diesel engines. They comment further that the sulfur-in-fuel limit does not agree with the sulfur limit specified in 40 CFR 60.4207 and 80.510(b), which are put forth in 40 CFR Subpart IIII (New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines).

AQD response:

The language states that the sulfur content of diesel fuel is being addressed, which puts forth that the requirements of this special condition only apply to diesel engines. The sulfur-in-fuel limits in Subpart IIII are more restrictive than those in special condition III.1 of the draft ROP, which are taken from the Michigan Administrative Rule and the Michigan State Implementation Plan. Since both FGENGINES and FGCIENGINES serve to limit the sulfur-in-fuel content of the same diesel-fired engines, the limits should be the same. Special condition III.1 in FGENGINES has been changed to match special condition III.1 in FGCIENGINES.

Comment 27 – FGCIENGINES, Description (page 47 of draft ROP)

DWSD states that the description should include 7 engines, adding EUGEN-P1 and EUGEN-P2.

AQD response:

FGCIENGINES addresses engines that are subject to the requirements of 40 CFR Part 60, Subpart IIII. The engines designated as EUGEN-P1 and EUGEN-P2 are not subject to Subpart IIII, and should not be included as a part of FGCIENGINES.

Comment 28 – FGCIENGINES, I. Emission Limit(s), 3. NOx (page 47 of draft ROP)

DWSD comments that EUGEN-P1 and EUGEN-P2 should be included in the equipment column for the NOx limit.

AQD response:

As mentioned in the response to the last comment, these two engines are not subject to Subpart IIII due to the date that they were manufactured or modified/reconstructed, and should thus not be included as part of the FGCIENGINES flexible group.

Comment 29 – Appendices – Appendix 1: Abbreviations and Acronyms (page 57)

DWSD comments that an abbreviation for hydrocarbons should be added to the list (HC), and that the abbreviation NMOC should be changed to NHMC (for non-methane hydrocarbons).

AQD response:

AQD agrees that both of these additions are necessary as these acronyms are used in the emission limits in 40 CFR Subpart IIII, which are included in the Emission Limit table in the FGCIENGINES flexible group.

Comment 30 – Appendices – Appendix 5: Testing Procedures, Table 1 (page 61)

DWSD comments that the listed test method for visible emission is actually for opacity.

AQD response:

The content of Appendix 5 in the draft ROP is a direct carryover from the initial ROP, in which Appendix 5 served to present the testing elements of the Yellow Plume Abatement Plan. The Yellow Plume Abatement Plan is not part of the ROP renewal, as it was addressed during the term of the initial ROP. Appendix 5 of the ROP renewal should list the testing requirements as found in 40 CFR Part 60, Subpart MMMM as they apply to FGC1ASH, FGC2ASH, FGCOMPLEX1 and FGCOMPLEX2. Appendix 5 was changed to serve this purpose.

Comment 31 – Appendices – Appendix 5: Testing Procedures, Table 2 (page 62)

DWSD states that the test method for mercury should be changed to Method 7471B of US EPA document SW-846. This method addresses testing the amount of mercury in sewage sludge.

AQD response:

The response for Comment 30 applies to this comment, as well. Appendix 5 of the ROP renewal should list the testing requirements as found in 40 CFR Part 60, Subpart MMMM as they apply to FGC1ASH, FGC2ASH, FGCOMPLEX1 and FGCOMPLEX2. Appendix 5 was changed to serve this purpose.

Comment 32 – Appendices – Appendix 6: Permits to Install (page 62)

DWSD states that the description of Permit to Install 252-06 should include both natural gas and diesel-fired engines, and that the flexible group designations FGENGINES and FGCIENGINES should both be included in this appendix.

AQD response:

As stated in previous responses, the terms and conditions of PTI 252-06 are summarized in the FGENGINES flexible group, which addresses all 17 engines. Thus, the layout in the draft ROP is appropriate for the intended purpose.

Comments received from EPA – Region 5 Air Permits Section:

EPA-Region 5 Air Permits Section staff sent correspondence dated September 25, 2013 in which they provided AQD with their comments regarding the draft ROP.

Per their letter, EPA had a comment relating to the FGENGINES Flexible Group. EPA noted that the draft ROP and the Staff Report both reference three federal regulations – 40 CFR Part 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines); 40 CFR Part 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines); and 40 CFR Part 63, Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines). EPA commented that the ROP should the details of the applicable aspects of these regulations.

AQD response:

The seventeen engines that make up the FGENGINES Flexible Group were permitted by DEQ-AQD's Permit Unit, with Permit to Install (PTI) No. 252-06 being issued to DWSD per a letter dated December 21, 2006. At the time that this PTI was reviewed and issued, the area source MACT portion of 40 CFR Part 63, Subpart ZZZZ had not yet been promulgated, and the New Source Performance Standards for the engines (40 CFR Part 60, Subparts IIII and JJJJ) had not yet been crafted and promulgated.

One of the requirements of a ROP is to incorporate all applicable permits and regulations that apply to a facility and its emission units into the ROP. Accordingly, the purpose of the establishment and inclusion of the FGENGINES Flexible Group is to incorporate the conditions and requirements put forth in PTI No. 252-06 into the ROP. However, the Flexible Group must also account for any new or updated requirements pertaining to the engines that have been promulgated in the time since PTI No. 252-06 was issued. The area source MACT and the two NSPS regulations were put in place after PTI No. 252-06 was issued. As such, they need to be accounted for in the ROP renewal process, so these regulations were checked for their applicability to the engines included in FGENGINES.

Per the applicability requirements of 40 CFR Part 63, Subpart ZZZZ, as put forth in 63.6585, the seventeen engines are not subject to the this subpart. Paragraph (f)(3) specifically exempts "...existing institutional emergency RICE located at an area source of HAP emissions that do not operate or are not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) and that do not operate for the purpose specified in §63.6640(f)(4)(ii)." Both the natural gas-fired and the diesel-fired engines at the DWSD-WWTP that make up FGENGINES operate within the guidelines of this exemption; the engines do not operate more than 15 hours per year for the purposes specified in 63.6640(f)(2)(ii) and (iii), and they do not operate at all for the purposes specified in 63.6640(f)(4)(ii).

During the review of the ROP, the status of the engines in terms of Subpart ZZZZ applicability was checked with MDEQ-AQD's Permit Unit. The Permit Unit provided the opinion that the provisions of Subpart ZZZZ do not apply, and that the engines would need to comply with the applicable provisions of NSPS Subparts IIII and JJJJ. The Permit Unit did recommend including a reference to Subpart ZZZZ under "Other Requirements" as the engines are, technically, subject to the MACT per the applicability statement contained in the first sentence of 63.6585, and there could be future modifications to the regulation that would apply to the engines.

Regarding the NSPS standards, the engines were checked for applicability to 40 CFR Part 60, Subparts IIII and JJJJ. Regarding the natural gas-fired engines, the applicability provisions of Subpart JJJJ for owners and operators are found in 60.4230(4) through (6). Paragraphs (4) and (5) do not apply to the engines, but paragraph (6) gives the impression of drawing them in to applicability by stating:

"The provisions of §60.4236 of this subpart are applicable to all owners and operators of stationary ICE that commence construction after June 12, 2006."

All of the natural gas-fired engines in FGENGINES commenced construction after June 12, 2006 so the language in paragraph (6) implies that all of them are subject to Subpart JJJJ. However, paragraph (6) states that these engines are only subject to the provisions of §60.4236; these provisions address time deadlines associated with importing or installing stationary engines that were produced in previous model years. This does not apply to the engines at the WWTP as they were installed new at the site. As with the MACT standard (Subpart ZZZZ), the Permit Unit recommended including a reference to Subpart JJJJ under "Other Requirements" as the natural gas engines are, technically, subject to the Subpart, but there are not any applicable requirements at this time.

The diesel-fired engines were checked for applicability to 40 CFR Part 60 Subpart IIII. The applicability provisions for Subpart IIII for owners and operators are found in 60.4200. Paragraph (2) states that

Subpart IIII is applicable to stationary ICE that "...commence construction after July 11, 2005, where the stationary CI ICE are:...(i) Manufactured after April 1, 2006, and are not fire pump engines...". These timeframes would place five of the diesel-fired engines in FGENGINEs as being subject to Subpart IIII – EUGEN-D1A, EUGEN-D1B, EUGEN-D2, EUGEN-D5 and EUGEN-D6. In addition to their inclusion as part of FGENGINEs, because these five engines are subject to Subpart IIII, they were also placed in a separate Flexible Group, FGCIENGINEs, in order to include the applicable provisions of Subpart IIII in the ROP.

The applicability of Subpart IIII to some of the engines caused a change in the sulfur in fuel permit condition in FGENGINEs. The sulfur-in-fuel limits in Subpart IIII are more restrictive than those in special condition III.1 in FGENGINEs of the draft ROP, which are taken from the Michigan Administrative Rule and the Michigan State Implementation Plan. Since both FGENGINEs and FGCIENGINEs serve to limit the sulfur-in-fuel content of some of the same diesel-fired engines, the limits should be the same. Accordingly, special condition III.1 in FGENGINEs has been changed to match special condition III.1 in FGCIENGINEs.

Changes to the August 26, 2013 Draft ROP

The changes described in the "Summary of Pertinent Comments" section of this addendum were incorporated into the draft ROP.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B2103

JANUARY 31, 2014 STAFF REPORT ADDENDUM

MI-ROP-B2103-2014

Purpose

A Staff Report dated August 26, 2013, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 45-day EPA comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the proposed ROP resulting from these pertinent comments.

General Information

Responsible Official:	Wendy Barrott, WWTP General Manager 313-297-0300
AQD Contact:	Stephen Weis, Senior Environmental Engineer 313-456-4688

Summary of Pertinent Comments

No pertinent comments were received during the 45-day EPA comment period.

Changes to the December 13, 2013 ROP

No changes were made to the proposed ROP.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B2103

**APRIL 28, 2014 STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION**

MI-ROP-B2103-2014a

Purpose

On January 31, 2014, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B2103-2014 to Detroit Water and Sewerage Department Detroit Wastewater Treatment Plant pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Wendy Barrott, Interim Wastewater Director
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 269-567-3548
Application Number:	201400048
Date Application For Minor Modification Was Submitted:	March 19, 2014

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

Incorporate Permit to Install (PTI) No. 61-13.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the DEQ

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B2103-2014a, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. 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 the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B2103

**JUNE 13, 2014 STAFF REPORT ADDENDUM FOR
RULE 216(2) MINOR MODIFICATION**

MI-ROP-B2103-2014a

Purpose

A Staff Report dated April 28, 2014, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

General Information

Responsible Official:	Wendy Barrott, Interim Wastewater Director
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 269-567-3548

Summary of Pertinent Comments

No pertinent comments were received during the USEPA's 45-day comment period.

Changes to the April 28, 2014 Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

B2103

RENEWABLE OPERATING PERMIT

**AUGUST 31, 2015 STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION**

ROP Number

MI-ROP-B2103-2014b

Purpose

On June 13, 2014, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B2103-2014b to Detroit Water and Sewerage Department Detroit Wastewater Treatment Plant pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Wendy Barrott, General Manager
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 517-582-5913
Application Number:	201500119
Date Application For Minor Modification Was Submitted:	July 23, 2015

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

Incorporate PTI No. 61-13A. PTI 61-13A is modification of PTI No. 61-13 to allow more flexibility for sludge processing during the early stages of operating the new biosolids drying facility. Specifically, the DWSD requested flexibility to operate any of the remaining 13 incinerators during the transition period from beginning operation of the biosolids drying facility until all Complex I incinerators have permanently ceased operating. The applicant proposes no changes to the equipment configuration, no changes to emission controls, and no changes to allowed emissions, stack parameters, or stack locations.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change at the time of approval of the Minor Modification to the ROP except for requirements listed in Appendix 2 of the ROP. The table in Appendix 2 contains a Schedule of Compliance developed pursuant to R 336.1119(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 requirements involved with the change that the source is not in compliance with at the time of permit issuance is supplemental to, and shall not sanction non-compliance with, the applicable requirements on which it is based.

Action Taken by the DEQ

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B2103-2014a, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. 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 the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.

Purpose

A Staff Report dated August 31, 2015, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

General Information

Responsible Official:	Wendy Barrott, General Manager
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 517-582-5913

Summary of Pertinent Comments

No pertinent comments were received during the USEPA's 45-day comment period.

Changes to the August 31, 2015 Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B2103

**DECEMBER 15, 2015 STAFF REPORT FOR
RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE
AMENDMENT**

MI-ROP-B2103-2014c

Purpose

On October 16, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B2103-2014b to Detroit Water and Sewerage Department – Detroit Wastewater Treatment Plant pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(1)(a)(i-iv).

General Information

Responsible Official:	Sue McCormick, Executive Director
AQD Contact:	Caryn E. Owens, Environmental Quality Analyst 231-876-4414
Application Number:	201500203
Date Application For Administrative Amendment Was Submitted:	November 16, 2015

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to R 336.1216(1)(a)(i).

Description of Changes to the ROP

Facility name change from Detroit Water and Sewerage Department - Detroit Wastewater Treatment Plant to Great Lakes Water Authority - Detroit Wastewater Treatment Plant. This change was issued December 16, 2015 and becomes effective January 1, 2016.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Administrative Amendment to the ROP.

Action Taken by the DEQ

The AQD approved an Administrative Amendment to ROP No. MI-ROP-B2103-2014b, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B2103

**JULY 12, 2017 STAFF REPORT FOR RULE 216(2)
MINOR MODIFICATION**

MI-ROP-B2103-2014d

Purpose

On January 1, 2016, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B2103-2014c to Great Lakes Water Authority - Detroit Wastewater Treatment Plant pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Majid Khan, Director of Wastewater Operations 313-297-4301
AQD Contact:	Caryn Owens, Environmental Engineer 231-876-4414
Application Number:	201700081
Date Application For Minor Modification Was Submitted:	June 13, 2017

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

The facility installed a Packed tower liquid counter flow scrubber to each dryer train (EUDryerTrainA, EUDryerTrainB, EUDryerTrainC, and EUDryerTrainD) using exemption R 336.1285(2)(e) to further reduce SO₂ emissions. With the installation of the new control equipment, the Detroit District Office requested Conditions be added to FGDryerTrains, so the equipment is operated and maintained properly.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the DEQ

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B2103-2014c, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. 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 the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable

emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.