

State Registration Number
B7302

Michigan Department of Environmental Quality
Air Quality Division
**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B7302-2016c

Weyerhaeuser NR Company

SRN: B7302

Located at:

4111 West Four Mile Road, Grayling, Crawford County, Michigan 49738

Permit Number: MI-ROP-B7302-2016c

Staff Report Date: November 2, 2015

Amended Dates: September 22, 2016
October 12, 2017
February 19, 2019

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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State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B7302

NOVEMBER 2, 2015 - STAFF REPORT

MI-ROP-B7302-2016

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 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 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:	Weyerhaeuser NR Company 4111 West Four Mile Road Grayling, Michigan 49738
Source Registration Number (SRN):	B7302
North American Industry Classification System (NAICS) Code:	321219
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201400146
Responsible Official:	Rina (Allen) Bethany, Plant Manager 989-348-3401
AQD Contact:	Rob Dickman, Environmental Quality Analyst 231-876-4412
Date Application Received:	September 15, 2014
Date Application Was Administratively Complete:	September 15, 2014
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	November 2, 2015
Deadline for Public Comment:	December 2, 2015

Source Description

The Weyerhaeuser Company manufactures oriented strand board (OSB) panels commonly used as construction material. The product is contains layers of dry wood strands, resin, and wax pressed under high temperature and pressure to form a panel. The process begins with whole logs which are debarked and chipped into flakes. The flakes are then dried using four rotary dryers that utilize waste wood and/ or natural gas for fuel. Flakes are then sorted by size and stored in silos until needed. At the press line, the flakes are conveyed on to mats, oriented to increase the strength of the finished product, and sprayed with wax and resins. These mats are then fed in to the press which applies temperature and pressure. Heat to the press line is from hot oil supplied by two thermal oil heaters. The result is a structure panel. The panels are cut to size and prepared for shipping.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) in the **2014** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	79.1
Lead (Pb)	0
Nitrogen Oxides (NO _x)	89.7
Particulate Matter (PM)	65.7
Sulfur Dioxide (SO ₂)	3.1
Volatile Organic Compounds (VOCs)	90
Individual Hazardous Air Pollutants (HAPs) *	0
Total Hazardous Air Pollutants (HAPs)	0

*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 located in Crawford County, which is currently designated by the U.S. 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 particulate matter, nitrogen oxides, carbon monoxide, and volatile organic compounds exceeds 100 tons per year, the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is equal to or more than 10 tons per year, the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

The facility was subject to review under the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of carbon monoxide was greater than 250 tons per year

EUPRESSLINE, EUCOEN (when firing wood), and FGDRYERS at the stationary source are subject to the Maximum Achievable Control Technology Standards for National Emission Standards for Hazardous Air Pollutants, Plywood and Composite Wood Products promulgated in 40 CFR Part 63, Subparts A and DDDD.

EUIBW and EUCOEN (when firing natural gas and exhausting through SVCOEN) at the stationary source is subject to the Maximum Achievable Control Technology Standards for National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR Part 63 Subparts A and DDDDD.

EUDIESELHOTOIL, EUEMERGENCYGEN, and EUFIREPUMP at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE MACT).

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."

EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4 and EUCOEN (when firing wood) at the stationary source are subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64. These emission units have a control device and potential pre-control emissions of Particulate Matter greater than the major source threshold level. The monitoring for the control device is continuous opacity monitoring.

Permit to Install (PTI) number 140-14 was integrated in to the draft ROP. This PTI removed the MDI storage tanks from EUBLENDVENT as they were exempt from permitting. Also, EUBLENDVENT was added to FGWOODHANDLING.

PTI number 13-15 was integrated in to the draft ROP. This PTI removed the greenhouse gas emissions limit from Source Wide Conditions pursuant to a Supreme Court ruling dated June 23, 2014 which ended the biogenic deferral.

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-B7302-2010 are identified in Appendix 6 of the ROP.

PTI Number			
535-94B	138-93	43-88A	397-85
546-92	603-87C	435-80B	1199-90
264-87	80-86	502-85	

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and Rule 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.

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EUHOTSYENERGY	300,000 BTU/hr Natural gas-fired service water heater	R 336.1212(4)(b)	R 336.1282(b)(i)
EUHOTSYMAINT	300,000 BTU/hr natural gas fired service water heater	R 336.1212(4)(b)	R 336.1282(b)
EUHOTSYPORABLE	300,000 BTU/hr propane fired service water heater	R 336.1212(4)(b)	R 336.1282(b)(ii)
EUTDCFURNACE1	Natural gas-fired 30,000 BTU/hr S04001 Furnace No. 1 - TDC	R 336.1212(4)(b)	R 336.1282(b)(i)
EUTDCFURNACE2	Natural gas-fired 30,000 BTU/hr S04001 Furnace No. 2 - TDC	R 336.1212(4)(b)	R 336.1282(b)(i)
EUWATERHEATER	Natural gas-fired 400,000 BTU/hr P03001 Water Heater for Office Area	R 336.1212(4)(b)	R 336.1282(b)(i)
EUFURNACE1	Natural gas-fired 80,000 BTU/hr S04001 Furnace for space heater	R 336.1212(4)(b)	R 336.1282(b)(i)
EUFURNACE2	Natural gas-fired 80,000 BTU/hr S04001 Furnace for space heater	R 336.1212(4)(b)	R 336.1282(b)(i)
EULPTANK01	S06005 LP storage tank with a rated capacity of 1,000 gallons	R 336.1212(4)(c)	R 336.1284(b)
EULPTANK02	S06005 LP storage tank with a rated capacity of 1,000 gallons	R 336.1212(4)(c)	R 336.1284(b)
EUPONDBOILER1	Natural gas-fired 1,000,000 BTU/hr B02001 Boiler used to heat Vats	R 336.1212(4)(b)	R 336.1282(b)(i)
EUPONDBOILER2	Natural gas-fired 1,000,000 BTU/hr B02001 Boiler used to heat Vats	R 336.1212(4)(b)	R 336.1282(b)(i)
EUPARTSWASHER1	Parts washer in maintenance shop with air/vapor interface of less than 10 square feet, cleaning agent does not contain VOCs.	R 336.1212(4)(a)	R 336.1281(h)
EUPARTSWASHER2	Parts washer in maintenance shop with air/vapor interface of less than 10 square feet, cleaning agent does not contain VOCs	R 336.1212(4)(a)	R 336.1281(h)
EUMDITANKS	MDI tanks used for resin storage	R 336.1212(4)(c)	R 336.1284(i)

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.

Emission Unit/ Flexible Group ID	Permit Term(s) and/or Condition(s) in Dispute	Applicant's Objection
EUCOEN	All changes to this section.	The entire section should reflect the fact that EUCOEN is subject to PCWP MACT and therefore is not subject to Boiler MACT. – (40 CFR 63.7491(h), 40 CFR 63.2292, 40 CFR 63.2294)
Non-Applicable Requirements	Justification	Remove "This only applies when the emission unit is firing on wood fuel." – (40 CFR 63.7491(h), 40 CFR 63.2292, 40 CFR 63.2294)

The facility believes that EUCOEN is not subject to 40 CFR Part 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutant, Industrial, Commercial, and Institutional Boilers and Process Heaters as 40 CFR 63.7491(h) states that the types of boilers and process heaters not subject to this subpart include any boiler or process heater that is part of the affected source subject to another subpart of this part. This would include 40 CFR Part 63, Subpart DDDD National Emission Standards for Hazardous Air Pollutants, Plywood and Composite Wood Products. However, in an opinion dated August 13, 2015, USEPA representatives indicated that when EUCOEN is firing on natural gas and exhausting through a separate stack, the EUCOEN system is not subject to 40 CFR Part 63, Subpart DDDD and therefore is subject to 40 CFR Part 63, Subpart DDDDD.

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 MDEQ, 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 Janis Ransom, Cadillac 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

RENEWABLE OPERATING PERMIT

ROP Number

B7302

DECEMBER 22, 2015 - STAFF REPORT ADDENDUM

MI-ROP-B7302-2016

Purpose

A Staff Report dated November 2, 2015, 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:	Rina (Allen) Bethany, Plant Manager 989-348-3401
AQD Contact:	Rob Dickman, Environmental Quality Analyst 231-876-4412

Summary of Pertinent Comments

The following comments were received by Weyerhaeuser NR Company during the 30-day public comment period:

Comment 1

The facility disagreed that the EUCOEN combustion unit is subject to both the PCWP MACT and the Boiler MACT. They believe that the current configuration of the system demonstrates that the emission unit is subject only to the PCWP MACT.

The AQD sought an opinion from USEPA regarding this issue. They indicated that when burning natural gas and exhausting through a separate stack, that system is subject to Boiler MACT. When the unit is combusting wood and natural gas and exhausting through the dryer, the system containing the TOH, its conveyance to the dryer and the dryer are subject to the strand dryer control requirements in PCWP MACT. Because of this unusual configuration, the facility would definitely need to keep very good records of what they are burning to show compliance with each rule.

The AQD is compelled to agree with USEPA. Therefore, no changes were made to the draft as a result of this comment.

Comment 2

Under EUIBW, Monitoring/Recordkeeping, the facility wishes Condition #4 to be amended such that the semiannual compliance report is removed and placed in a separate condition. Reasoning given for this is that this reporting is not part of the Boiler MACT.

This reporting is a part of the Boiler MACT and is separate from ROP semiannual reporting. Additionally, this condition is replicated verbatim from the regulation. However, the facility is only required to submit an annual report under this MACT, not a semiannual report. Therefore, references to the semiannual report were removed from this condition.

Comment 3

Under EUIBW, Reporting, 9.b, the facility is asking that the words, “where applicable” be placed at the end of this condition. The reasoning given being that this unit, when burning natural gas, is not subject to emission limitations or operating parameter limitations.

The AQD feels that this is a point of clarification and has made this change to the draft.

Comment 4

Under EUACOEN, Process description, the facility is requesting that the description of the capacity of the unit be changed to “50 MMBtu/hr when fired on wood and wood dust or 40 MMBtu/hr when firing on natural gas”

The AQD feels this description is more accurate and has made this change to the draft.

Comment 5

Under EUACOEN, Monitoring/Recordkeeping, the facility wishes Condition #4 to be amended such that the semiannual compliance report is removed and placed in a separate condition. Reasoning given for this is that this reporting is not part of the Boiler MACT.

This reporting is a part of the Boiler MACT and is separate from ROP semiannual reporting. Additionally, this condition is replicated verbatim from the regulation. However, the facility is only required to submit an annual report under this MACT, not a semiannual report. Therefore, references to the semiannual report were removed from this condition.

Comment 6

Under EUACOEN, Reporting, 6.b, the facility is asking that the words, “where applicable” be placed at the end of this condition. The reasoning given being that this unit, when burning natural gas, is not subject to emission limitations or operating parameter limitations.

Similar to Comment 3, the AQD feels that this is a point of clarification and has made this change to the draft.

Comment 7

Under EUACOEN, Other Requirements, the facility is asking for the following changes (in italics):

2. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants from Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. *The EU COEN combustion Unit is only subject to the applicable requirements of 40 CFR Part 63, Subpart DDDDD when the exhaust from the EUACOEN combustion unit is venting to atmosphere. (40 CFR Part 63, Subpart DDDDD)*
3. *When the exhaust from the EUACOEN combustion unit is directly firing through the process, the EUACOEN combustion unit will only be subject to the applicable requirements of 40 CFR Part 63, Subpart DDD National Emissions Standards for Hazardous Air Pollutants for Major Sources: Plywood and Composite Wood Products (40 CFR Part 63, Subpart DDDD)*

The reasoning given for this change is to clarify which federal standard the unit is subject to under different operating scenarios.

The AQD agrees that this clarification is justified and has changed the draft to reflect this. The language used is slightly different than the proposed language such that it is consistent with the rest of the draft permit.

Comment 8

The facility commented that the legal name of the owner of the facility is Weyerhaeuser NR Company. References to the contrary were corrected in the draft ROP.

Comment 9

The facility requested that language be added to the staff report that the facility is no longer subject to Prevention of Significant Deterioration regulations for Carbon Monoxide.

The statement that the facility is subject is in error. They are currently not subject to Prevention of Significant Deterioration regulations for Carbon Monoxide.

Changes to the November 2, 2015 Draft ROP

Changes made to the draft in response to the comments are as follows:

Comment 1

The AQD is compelled to agree with USEPA. Therefore, no changes were made to the draft as a result of this comment.

Comment 2

References to the semiannual report were removed from the cited condition.

Comment 3

The AQD changed the draft as requested and added “where applicable” to the cited condition.

Comment 4

The AQD changed the draft as requested and added “50 MMBtu/hr when fired on wood and wood dust or 40 MMBtu/hr when firing on natural gas” to the cited description.

Comment 5

References to the semiannual report were removed from the cited condition.

Comment 6

The AQD changed the draft as requested and added “where applicable” to the cited condition.

Comment 7

Under EUCOEN, Other Requirements, the AQD added the following conditions:

2. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subparts A and DDDDD, National Emission Standards for Hazardous Air Pollutants from Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters when the emission unit is venting directly to atmosphere and not through the process. (40 CFR Part 63, Subpart A and DDDDD)
3. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subparts A and DDDD National Emissions Standards for Hazardous Air Pollutants for Major Sources: Plywood and Composite Wood Products when the exhaust from the EUCOEN is directly firing and venting through the process (40 CFR Part 63, Subpart A and DDDD)

Comment 8

The facility commented that the legal name of the owner of the facility is Weyerhaeuser NR Company. References to the contrary were corrected in the draft ROP.

Comment 9

The staff report cannot be amended. However, the statement that the facility is subject is in error. They are currently not subject to Prevention of Significant Deterioration regulations for Carbon Monoxide.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

B7302

**SEPTEMBER 22, 2016 - STAFF REPORT FOR
RULE 216(2) MINOR MODIFICATION**

MI-ROP-B7302-2016a

Purpose

On March 8, 2016, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B7302-2016 to Weyerhaeuser NR Company 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:	Rina (Allen) Bethany, Plant Manager 989-348-3401
AQD Contact:	Caryn E. Owens, Environmental Quality Analyst 231-876-4414
Application Number:	201600145
Date Application For Minor Modification Was Submitted:	August 31, 2016

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

Remove particulate matter (PM) Emission Limit for EUACOEN in Section I. Emission Limits in FGDRYERS and the testing requirement to test EUACOEN for PM, since the Emission Unit is not subject to 40 CFR Part 60, Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

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-B7302-2016, 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 September 22, 2016, 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:	Rina (Allen) Bethany, Plant Manager 989-348-3401
AQD Contact:	Caryn E. Owens, Environmental Quality Analyst 231-876-4414

Summary of Pertinent Comments

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

Changes to the September 22, 2016 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
B7302

RENEWABLE OPERATING PERMIT
OCTOBER 12, 2017 - STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION

ROP Number
MI-ROP-B7302-2016b

Purpose

On November 15, 2016, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B7302-2016a to Weyerhaeuser NR Company 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:	Rina (Allen) Bethany, Plant Manager 989-348-3401
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-876-4414
Application Number:	201700114
Date Application for Minor Modification Was Submitted:	August 30, 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

Incorporate PTI 535-94F, which replaces the existing board press with a new press that is the same size. The new press will be controlled by the existing biofilter and press enclosure and exhaust through the existing stack.

In addition, Weyerhaeuser requested to increase the press PM10 emission limit from 8.4 lb/hr to 10.5 lb/hr to provide a safety factor.

Weyerhaeuser also requested to reduce the press formaldehyde emission limit from 2.3 lb/hr to 1.0 lb/hr.

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-B7302-2016a, 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.

State Registration Number
B7302

RENEWABLE OPERATING PERMIT
FEBRUARY 19, 2019 - STAFF REPORT FOR
RULE 216(2) MINOR MODIFICATION

ROP Number
MI-ROP-B7302-2016c

Purpose

On December 1, 2017, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B7302-2016b to Weyerhaeuser NR Company pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

General Information

Responsible Official:	Rina (Allen) Bethany, Plant Manager 989-348-3401
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-878-6688
Application Number:	201800156
Date Application for Minor Modification was Submitted:	December 6, 2018

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

Description of Changes to the ROP

Incorporate PTI 535-94G, which replaces four former dryers with four new dryers. The new dryers have slightly larger burners that will exhaust to the existing control equipment. The dryers are listed under the same names as the former dryers, but the Modification/Installation date has been updated in the Emission Unit Summary Table. The new dryers will be controlled by the existing wet electrostatic precipitator (WESP) and two regenerative thermal oxidizer (RTOs) and exhaust through the existing stack.

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-B7302-2016b, 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 United States 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.