



State Registration Number

A7809

Michigan Department Of Environmental Quality
Air Quality Division

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

RO Permit Number

199600132d

United States Steel Corporation, Great Lakes Works

SRN: A7809

located at

No. 1 Quality Drive, Ecorse, Michigan, 48229

Permit Number: 199600132d

Staff Report Date: June 23, 2004

RO Permit Issuance Date: March 1, 2005

Revision Date: January 10, 2006, June 1, 2006,
October 11, 2006, March 6, 2007

RO Permit Expiration Date: March 1, 2010

This Staff Report is published in accordance with Part 5506 and 5511 of Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994. Specifically, R 336.1214(1) requires that the Department of Environmental Quality, (Department), Air Quality Division (AQD), shall prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating (RO) Permit.

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RENEWABLE OPERATING PERMIT

A7809

199600132

July 28, 2003, STAFF REPORT

Facility

United States Steel Corporation, Great Lakes Works
No. 1 Quality Drive
Ecorse, MI 48229

Purpose

Major stationary sources of air pollutants are required to obtain and operate in compliance with a Renewable Operating (RO) permit 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 Article II, Chapter I, Part 55 of P.A. 451 of 1994. Major stationary sources are defined by criteria in administrative rule R 336.1211(1). The RO permit is intended to simplify and clarify a facility's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by R 336.1214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to R 336.1212(6), and any determination made pursuant to R 336.1213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Facility Mailing Address:	No. 1 Quality Drive Ecorse, Michigan 48229
Source Registration Number (SRN):	A7809
Standard Industrial Classification (SIC) Code:	3312
Number of Stationary Source Sections:	7
Application Number:	199600132
Responsible Official:	Section No. 1 United States Steel, Great Lakes Works Fred T. Harnack, General Manager Phone: 313-749-2210 Section No. 2 Delray Connecting Railroad Company Michael Moss Phone: 412-433-3109 Section No. 3 International Mill Services, Inc Michael Connolly, Director Environmental Engineering Phone: 215-956-5618 Section No. 4 Great Lakes Recovery System, Inc

	<p>James F. Torok, VP, Operations & Technology Phone: 219-392-1401</p> <p>Section No. 5 Edison Energy Services Fred T. Harnack, General Manager Phone: 313-749-2210</p> <p>Section No. 6 AKJ Industries, Inc John Bielich, VP, Steel Operations Phone: 412-233-7222</p> <p>Section No. 7 DTE Energy Services Fred T. Harnack, USSCGLW General Manager Phone: 313-749-2210</p>
AQD Permit Contact Person:	Bernardo B. Sia, Senior Environmental Engineer Phone: 734-953-1416
Date Permit Application Submitted:	January 24, 1997
Date Application Administratively Complete:	February 4, 1997
Is Application Shield in Effect?:	Yes
Date Public Comment Begins:	July 28, 2003
Deadline for Public Comment:	August 27, 2003

Source Description

United States Steel, Great Lakes Works operates an integrated steel mill that has been in operation since August 1930. It is located just south of the City of Detroit. The site consists of approximately 1100 acres that span along the Detroit River through the cities of Ecorse and River Rouge. The facility includes the Main Plant Area, the 80-inch Hot Strip Mill, and the iron making and coke making operations on Zug Island. The plant produces flat-rolled steel products for the automotive, appliance, container, service center, and piping and tubing industries.

The primary iron producing facility is located in Zug Island, City of River Rouge which is bordered by the Rouge River on the north, south, and west sides and the Detroit River on the east side. The Zug Island facility includes, but is not limited to, three operating blast furnaces, one coke oven, coke by-product recovery plant, three boiler houses. The facility site is zoned heavy industrial. The nearest residential area is approximately 0.6 mile from the facility.

The 80-inch Hot Strip Mill facility is located in the City of River Rouge between the Zug Island and Main Plant facility location. The 80-inch Hot Strip Mill facility includes the hot strip finishing and shipping building, scale pit, coil storage and shipping building, slab yard, and 80" hot strip mill. The facility site is zoned heavy industrial. The nearest residential area is approximately 1.5 mile from the facility.

The Main Plant Area is located on a 682 acre site located in the City of Ecorse. It is bordered by the Detroit River on the east, by the 80-inch Hot Mill Strip facility on the north, by the E.W. Levy Plant No. 5 on the south and Jefferson Avenue to the west. The following steel making operations are located at the Main Plant: No. 2 Basic Oxygen Process (#2 BOP), Vacuum Degasser, Ladle Metallurgical Facility (LMF), Pickle Line, Electro galvanizing Line, No.4 tandem cold mill, Annealing Furnace, and Boiler House. The plant site is zoned heavy industrial. The nearest residential area is approximately .5 mile from the facility.

There are six facilities that have equipment and/or processes with permit to install that are located inside or adjacent to the United States Steel, Great Lakes Works (USSGLW) facilities. These facilities / processes are used to support the main activity of the United States Steel, Great Lakes Works facilities. These six facilities are considered as part of as they qualify to be treated as a single stationary source with the United States Steel, Great Lakes Works facilities. These six facilities were aggregated to the United States Steel Great Lakes Works for purposes of the Title V, Renewable Operating Permit issuance. These six facilities are as follows:

1. International Mill Services, Inc is located in the USSGLW's 80" Hot Strip Mill. It operates a slab scarfing machine with a baghouse for pollution control.
2. Great Lakes Recovery Systems, Inc is located in the USSGLW's Main Plant. It operates a briquetting facility consisting of rotary drum drier with cyclone and baghouse, pug mills with baghouse, briquette screen with baghouse, and silo farm transfer system with baghouse dust collector.
3. Delray Connecting Railroad Company is located in the USSGLW's Zug Island facility. It operates a coke screening facility consisting of screen machine; conveyors for unscreened coke, furnace coke, nut coke, and coke breeze; and coke handling and storage.
4. Edison Energy Services is located in the USSGLW's Zug Island facility. It operates a pulverized coal transport system consisting of pulverized coal/air collection system, storage bin and air transport system.
5. AKJ Industries, Inc. is located in the USSGLW's Coke Plant, Zug Island facility. It operates a tar sludge recycling process. The tar sludge from the USSGLW's coke plant is liquefied and homogenized with diluent until it is flowable. The recycled product is sprayed onto United State Steel Corporation's coal belt.
6. DTE Energy Services currently owns the No. 5 Coke Battery and the No. 3 Coke Plant By-product Plant and operated by USSGLW. A separate section was requested by USSGLW to be created for the No. 5 Coke Battery and the No. 3 Coke Plant By-product Plant to reflect the current contractual arrangement.

The following table lists facility wide emission information as estimated for **2002**.

TOTAL FACILITY EMISSIONS-Criteria Pollutants

Pollutant	Tons per Year
Nitrogen Oxides-(NO _x)	3,785
Particulate Matter	1,170
Particulate Matter-(PM10)	698
Sulfur Dioxide-(SO ₂)	4,746
Volatile Organic Compounds(VOCs)	227
Carbon Monoxide	10,286

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

See Sections C & D in the attached draft RO Permit for summary tables of all processes at the facility that are subject to process-specific emission limits or standards in any applicable requirement.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non applicability for this source are addressed in the non-applicable requirement section of the staff report and section E of the ROP.

The facility is located in Wayne County which is currently designated as attainment for all criteria pollutants. The facility is considered a major Title V 40 CFR Part 70 source due to actual emissions of Carbon monoxide, Nitrogen oxides, and Particulate matter exceeding 100 tons per year. Installation dates for much of the equipment predate the requirement for a permit to install. Many of the facilities operations are regulated by the State regulations for particulate emissions. Some processes and equipment have both an Air Use Permit issued by the State and the former Wayne County Air Quality Management Division.

There are five outstanding Consent Orders entered into by the company with the County. These are SIP No. 27-1993 revised September 9, 1994; Consent Order No. 0035-97, effective June 3, 1999; Consent Order No. 96-10, effective December 6, 1996; Consent Order No. 90-2, effective June 29, 1990 and Consent Order No. 94-10, effective August 22, 1995. .

The stationary source is subject to the Maximum Achievable Control Technology (MACT) Standards for steel acid pickling promulgated in 40 CFR Part 63, Subpart CCC which took effect June 22, 2001, Maximum Achievable Control Technology (MACT) Standards for integrated iron and steel manufacturing promulgated in 40 CFR Part 63, Subpart FFFFF which took effect May 20, 2003, and Maximum Achievable Control Technology (MACT) Standards for coke ovens: pushing, quenching, and battery stacks promulgated in 40 CFR Part 63, Subpart CCCCC which took effect April 14, 2003.

The stationary source is subject to the New Source Performance Standards (NSPS) for basic oxygen furnace promulgated in 40 CFR, Part 60, Subpart Na. This applies only to the skimming operation at the Double Desulfurization Station in the Basic Oxygen Plant.

The stationary source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for coke by-product plant promulgated in 40 CFR, Part 61, Subpart FF, 40 CFR, Part 61, Subpart L, and 40 CFR, Part 61, Subpart V. Also for coke oven battery promulgated in 40 CFR, Part 61, Subpart L.

For the purpose of applicability to the Title V Renewable Operating Program (ROP), Edward C. Levy Company Plant 3 (Plant 3) was determined by the AQD to meet the criteria under Rule 336.1119(r) of a facility to be aggregated into a single stationary source with United States Steel, Great Lakes Works (USSGLW). Plant 3 is located on contiguous and adjacent properties of USSGLW. Plant 3 is wholly dependent upon USSGLW steel slag for its raw material. The AQD believes that the two facilities should be considered in the same industrial grouping regardless of whether the first two digits of the SIC codes for the two entities are the same because Plant 3 is considered a support facility for USSGLW. As indicated in the August 7, 1980, Federal Register (45 FR 52695), "one source classification encompasses both primary and support facilities, even when the latter includes units with a different two-digit SIC code. Support facilities are typically those which convey, store, or otherwise assist in the production of the principal product." Plant 3 is the sole recipient of USSGLW's BOF steel slag. Since removal of slag is essential to USSGLW's lawful production process, Plant 3 assists in the production of steel at USSGLW. Therefore, Edward C. Levy Company Plant 3 is a support facility and together with USSGLW constitutes a single source.

While the two facilities are considered the same source for Title V applicability, individual Title V permits are issued to Edward C. Levy Company Plant 3 and the United States Steel, Great Lakes Works separately. Through negotiations that arose from the court judgment of the suit filed by the company against the AQD contesting the aggregation of the Levy Plant 6 with Rouge Steel Company ROP, Edward C. Levy Company Plant 3 agreed to submit a separate ROP application and is issued its own ROP.

Please refer to Section E and Section F in the enclosed draft permit for detailed regulatory citations for each Emission Unit at the stationary source. Section A contains regulatory citations for General Conditions.

Streamlined Requirements

In the United States Environmental Protection Agency's White Paper Number 2 for Improved Implementation of the Part 70 Operating Permit Program, streamlining refers to the process of consolidating "multiple redundant or conflicting requirements on the same emission unit(s) into a single set of understandable and enforceable permit conditions". The resulting single set of requirements are considered "streamlined", while the original set(s) of conditions are considered to be "subsumed" within this new, more stringent, streamlined requirement. The following table summarizes the subsumed and streamlined requirements for this facility:

STREAMLINED AND SUBSUMED REQUIREMENTS SUMMARY

Table	Type of Requirement	Subsumed Requirement	Streamlined Requirement
E-01.19	Particulate Emission Limit	Permit to Install No. 590-77, Special Condition 12, (0.10lb/1,000 gas)	Rule 336.1331, Table 31C(1)(C), (0.057lb/1,000 gas)
E-01.16	Particulate Emission Limit	SIP Consent Order, Exhibit B, Paragraph 3, (0.007 grain per dry standard cubic foot of exhaust air). 40 CFR 60, Subpart Na, 60.142a(a)(2), (0.010 grain per dry standard cubic foot of exhaust air).	Permit to Install No. C-10699, C-10700 and C-10712, Special Condition 17, (0.0029 grain per dry standard cubic foot of exhaust air)
E-01.16	Visible Emission Limit from hot metal transfer or skimming controlled by baghouse	Rule 336.1365(1), 20% opacity	40 CFR 60, Subpart Na, 60.142a(a)(3), 5% opacity
E-01.21	Nitrogen Oxides pounds per hour limits when firing rich gas	Permit to Install No. C-10699, C-10700 and C-10712, Special Condition 59, (563.7 pounds per hour based upon a 24-hour averaging period)	Permit to Install No. 414-96, Special Condition 35, (563.7 pounds per hour)
E-01.21	Nitrogen Oxides pounds per hour limits when firing lean gas	Permit to Install No. C-10699, C-10700 and C-10712, Special Condition 60, (132.9 pounds per hour based upon a 24-hour averaging period)	Permit to Install No. 414-96, Special Condition 36, (132.9 pounds per hour)

Please refer to Sections B, C, and D in the enclosed draft permit for detailed regulatory citations for the stationary source. Section A contains regulatory citations for General Conditions.

Equivalent Requirements:

This permit does not include any equivalent requirements or significant changes pursuant to R 336.1212(6). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in an original New Source Review permit (NSR) or Consent Order/Judgment.

Non-applicable Requirements

Section G 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 RO Permit

The following table lists processes that were included in the RO permit application as exempt devices under R 336.1212(3) and (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	ROP Exemption	NSR Permit Exemption
DVPARTS-CLEANERS	Cold cleaner stations	R336.1212(3)(b)	R336.1281(h)
DVPAINT-BOOTH	Maintenance paint spray booth	R336.1212(3)(h)	R336.1287(b)
DVF-BLDG-ANNEAL	F Bldg Annealing Furnaces (11 units)	R336.1212(3)(c)	R336.1282(a)(i)
DVF-BLDG-ANNEAL	B Bldg Annealing Furnaces (10 units)	R336.1212(3)(c)	R336.1282(a)(i)
DVSANDBLASTING	Sandblasting	R336.1212(3)(b)	R336.1281(d)
DVH2-ANNEAL	J Bldg H2 Annealing Furnaces (7 units)	R336.1212(3)(f)	R336.1282(a)(i)
DVBOTTLE-CAR-REP	Bottle Car Repair Operations	R336.1212(4)(b)	R336.1282(b)(i)
DVCARPENTRY-SHOP	Carpenter Shop Operations	R336.1212(3)(f)	R336.1285(l)(iv)
DVFUELING-STA	Fuel Station, Dispensing	R336.1212(4)(c)	R336.1284(g)
DVLADLE-DRYOUT	Steel Ladle Maintenance Operations	R336.1212(4)(b)	R336.1282(b)(i)
DVSPACE-HEATERS	Numerous Space Heaters	R336.1212(4)(b)	R336.1282(b)(i)
DVNo.4TANDEMCOLD	No.4 Tandem Cold Rolling Mill	R336.1212(3)(f)	R336.1285(l)(i)
DV1&2CONCASTER	Nos. 1 and 2 Continuous Casters	R336.1212(3)(f)	R336.1285(l)(i)

Draft RO Permit Terms/Conditions Not Agreed to by Applicant

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to R 336.1214(2). If the person and the AQD cannot agree upon terms and conditions of a draft RO Permit, the terms and conditions that the AQD believes are necessary to comply with the requirements of R 336.1213 shall be incorporated into the RO Permit.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements at the time of issuance of the ROP except for requirements listed in Appendix 2 of the draft ROP. The table in Appendix 2 contains a Schedule of Compliance developed pursuant to Rule 119(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 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 Department

The AQD proposes to approve RO Permit No. 199600132. A final decision on the RO Permit 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 United States 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 Teresa Seidel, District Supervisor. The final determination for RO Permit 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 requirements, and resolution of any objections by the USEPA.



State Registration Number
A7809

Michigan Department Of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600132

October 28, 2003 STAFF REPORT ADDENDUM

Purpose

A Staff Report dated July 28, 2003, 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 Rule 214(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 Rule 214(3). During the initial 30-day public comment period held from July 28, 2003, through August 27, 2003, a public hearing was requested. In response to comments received requesting a public hearing, the Air Quality Division held a public hearing on August 28, 2003. In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	<p>Section No. 1 United States Steel, Great Lakes Works Fred T. Harnack, General Manager Phone: 313-749-2210</p> <p>Section No. 2 Delray Connecting Railroad Company Michael Moss Phone: 412-433-3109</p> <p>Section No. 3 International Mill Services, Inc Michael Connolly, Director Environmental Engineering Phone: 215-956-5618</p> <p>Section No. 4 Great Lakes Recovery System, Inc James F. Torok, VP, Operations & Technology Phone: 219-392-1401</p> <p>Section No. 5 Edison Energy Services Fred T. Harnack, General Manager Phone: 313-749-2210</p> <p>Section No. 6 AKJ Industries, Inc John Bielich, VP, Steel Operations Phone: 412-233-7222.</p> <p>Section No. 7 DTE Energy Services Fred T. Harnack, USSCGLW General Manager</p>
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	Phone: 313-749-2210
AQD Contact:	Bernardo B. Sia, Senior Environmental Engineer Phone: 734-953-1416

Summary of Pertinent Comments

The Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) received the following comments from the general public during a public hearing conducted on August 28, 2003, and during the public comment periods:

Comment: The environmental sampling and testing data submitted by the consulting company in behalf of the City of River Rouge to be reviewed by the MDEQ and hope changes be made to the permit provisions be made to address concerns. The data collected consist of ambient air samples, wipe samples of surfaces, soil samples, and water samples from the City of River Rouge and neighboring locales.

Response: The ROP is not the proper forum to address concerns based from the environmental sampling and testing data submitted in the reports. The environmental sampling and testing data submitted by the consultant for the City of River Rouge was reviewed by the AQD. Air pollution monitoring concerns and issues that the City wants as indicated by their consultants will be brought up and tried to be addressed with USSCGLW in other compliance mechanism by the AQD. Data results and concerns that involve other than air pollution in the reports will be referred to the MDEQ for Multi – media review.

Comment: Picture showing 100% opacity plume was presented. Comprehensive monitoring should be required from the company.

Response: The company having just taken over the company will conduct a thorough evaluation of the BOF operation to avoid the 100% opacity plume as shown in the picture from occurring again. The company indicated that they are conducting evaluation of all the equipment and processes and will conduct necessary corrections and modifications necessary to correct any identified problem/s.

Comment: Explosion like situation and thick cloud of smoke from the company is a daily occurrence. Find a way to monitor United States Steel operation 24-hours a day.

Response: The ROP has monitoring/recordkeeping and testing/recordkeeping conditions for all emission units that are deem necessary for basis of compliance for each applicable conditions in the ROP. The citizens are encouraged to call the AQD and file complaints when they observe the above situation / episode and the AQD will conduct investigations accordingly.

Comment: Fallouts still getting into his house from US Steel operations. Request the AQD to monitor US Steel operation closely and to enforce the air quality laws.

Response: The ROP has monitoring/recordkeeping and testing/recordkeeping conditions for all emission units that are deemed necessary for basis of compliance for each applicable condition in the ROP. The citizens are encouraged to call the AQD and file complaints when they observe or experience fallouts and the AQD will conduct investigations accordingly and take fallout samples when necessary for analysis.

The following comments were received from United States Steel, Great Lakes Works:

Comment: Create a separate section for the Levy Operations.

Response: The AQD agrees that it should be included and made a section of the ROP just like the other five support facilities are a section in the ROP. Edw. C. Levy Company Plant 3 is a support facility for US Steel Corporation – Great Lakes Works (USSCGLW). Levy Plant No. 3 meets all the criteria of Rule 336.1119(q) as a stationary source that must be aggregated in the USSCGLW’s Title V ROP.

While the two facilities are considered the same source for Title V applicability, individual Title V permits will be issued to Edward C. Levy Company Plant 3 and the USSCGLW separately. Through negotiations that arose from the court judgment of the suit filed by the company against the AQD contesting the aggregation of the Levy Plant 6 with Rouge ROP, Edward C. Levy Company Plant 3 agreed to submit a separate ROP application and will be issued its own ROP.

Comment: Applicable requirements to the Kish Wetting Station and related activities that are the responsibility of Levy Plant 3 operations shall be removed from the USSCGLW ROP and be cite in the Levy Plant 3 ROP.

Response: The Air Use Permit and Consent Orders where the applicable requirements came from were all issued to USSGLW. Until the Air Use Permits and Consent Orders are modified where the conditions are removed and transferred to Levy Plant 3 Permit, the compliance responsibility lies with USSCGLW and therefore should be included in the USSCGLW ROP. The AQD recognizes that most of the conditions/applicable requirements involve Levy Plant 3 activities and included the Kish Wetting Station as an emission unit in both USSCGLW and Levy Plant 3 ROPs.

Comment: US Steel suggests that the fugitive dust plan should be incorporated by reference into the permit, without restatement of its requirements, so that the ROP just requires compliance plan, whatever its current requirements. This would effectively meet the Title V permit requirement that the applicable requirements be included in the ROP without creating unnecessary complications anytime a need arose to modify the plan.

Response: The conditions of the fugitive dust plan were restated in the ROP when conditions were specific to the particular unit or flexible group and become an underlying applicable requirement to the emission unit or flexible group involved. Also fugitive dust plans were incorporated into consent orders and therefore cannot be modified without opening it up to review the consent order and therefore modifying it substantially somehow is not simple and therefore will not make it any different when restated in the ROP. Also restating the fugitive dust plans make review of applicable requirements of the plant during compliance inspections simpler since all the applicable requirements for the facility are in one document the ROP.

Changes to the July 28, 2003 Draft RO Permit

Emission Unit or Flexible Group ID	Changes Made
1. Table B-1, SOURCE-WIDE REQUIREMENTS, Part III.A.2.	Monitoring/Recordkeeping condition was added as required under Consent Order SIP 27-1993 and SIP 28-1993.
2. Table B-1, SOURCE-WIDE REQUIREMENTS, Part IV.4.	Reporting condition was added as required under Consent Order SIP 27-1993 and SIP 28-1993.
3. Table B-1, SOURCE-WIDE REQUIREMENTS , Part V.	Operational parameter conditions was added to cover requirements under Consent Order SIP 27-1993 and SIP 28-1993.
4. Table B-1, SOURCE-WIDE REQUIREMENTS, Part VI.1-2.	Conditions were added to cover Asbestos NESHAP requirements when USSGLW may during the term of the ROP conduct demolition, renovation and disposal activities of asbestos which trigger the NESHAP.

Emission Unit or Flexible Group ID	Changes Made
5. Table B-1, SOURCE-WIDE REQUIREMENTS, Part VI.3.	Condition was added to cover 40 CFR Part 63, Subpart FFFFF requirements that might have been inadvertently left off in individual subject emission unit and flexible group table.
6. Table E-01.03, EGARGON-STIR, Part III.A.3.1 and 2	Requirement to conduct non-certified visible emission observations was deleted and certified visible emissions observations requirements was modified from once a month to twice a year with a minimum of one hour duration each observation. Since the emission unit is a small source, daily monitoring and recording of the baghouse pressure drop, stack testing at least once every five years, and certified visible emissions observations twice a year are already adequate compliance monitoring requirements.
7. Table E-01.03, EGARGON-STIR, Part VI, Table E-01.04, EGLMF-OPERATIONS, Part VI, Table E-01.09, EGEGL-OPERATIONS, Part VI.2, Table F-01.07, FG2BOP-SHOP, Part VI.1	Deleted the requirements for the malfunction abatement plan (MAP) for the No. 1 Argon Stir Station Baghouse, the LMF Baghouse, and the EGL Scrubber from Table F-01.07, FG2BOP-SHOP and each was added to the appropriate Tables,
8. Table E-01.06, EGVDG-DGAS-BLR, Part III.A.2.32-3 and Part III.B.1-3	Requirement for particulate stack testing was removed since boiler is fired with only natural gas, as such likelihood of any exceedance is minimal and therefore does not justify the requirement to conduct particulate emission testing. In lieu, recordkeeping of boiler operating hours and emission rate calculation using AP42 emission factor to be done on a monthly basis were added as process monitoring requirement.
9. Table E-01.09, EGEGL-OPERATIONS, Part III.A.2.1	Water flow rate was replaced with water system pressures to reflect correct requirement by the consent decree which is the cited applicable requirement.
10. Table E-01.10, EGEGL-STO-TANKS, Part III.A.2.2	Deleted requirement to keep the records of the volume of sulfuric acid stored in the tanks per day since no use and connection in determining compliance with any existing permit limits.
11. Table E-01.18, EG2BOF-Vessels, Part II.B.1	For clarity, the language for the emission limit was revised to reflect the regulation language by adding <i>dry</i> before the word gas. R336.1331, Table 31, Section C(1)(A) contains the following footnote: "Compliance shall be determined by means of a comparison between the emission limit and the measured emission rate calculated on a dry basis (pounds particulate per 1,000 pounds dry gas)."
12. Table E-01.18, EG2BOF-VESSLS, Part III.A.3.1	Requirement to conduct non-certified visible emission observations was deleted as it is considered redundant because the stack has a continuous opacity monitor.
13. Table E-01.18, EG2BOF-VESSLS, Part III.A.3	A duration of one hour minimum to conduct certified visible emission observations was added to the condition to clarify the intention of the requirement and to specify the minimum acceptable duration of the observations.
14. Table E-01.18, EG2BOF-Vessels, Part VI.5.	This condition was added to reflect the condition of Consent Decree 96-10 that included the ability for the company to modify the blow rates in the ESP in the events of new stack test data.

Emission Unit or Flexible Group ID	Changes Made
<p>15. Table E-01.19, EG80MILLFURNCS, Part III.A.3.1 and 2; Table F-01.3, FGBHMP1-8&9-BLRS, Part III.B.3.1 and 2; Table F-01.2, FGBHZI-1&2BLRHSE, Part III.B.3.1 and 2;</p>	<p>Requirement to conduct non-certified visible emission observations was deleted and certified visible emissions observations requirements was modified from once a month to twice a year with a minimum of one hour duration each observation. Since the 80" Hot Strip Mill reheat furnaces and Main Plant Boilers 8 and 9 are fueled by gaseous fuels only, they are not prone to opacity excursions that are common in combustion sources using solid or liquid fossil fuels. The use of natural gas and coke oven gas only at the reheat furnace in is a good assurance that applicable opacity limit will be achieved on a continuous basis and twice a year certified visible emissions observations is enough monitor of compliance with the applicable opacity limit.</p>
<p>16. Table E-01.21, EGCOKE-BATTERY, Part III.A.2.11</p>	<p>Process monitoring and record keeping requirement was added as the basis of compliance for condition V.13</p>
<p>17. Table E-01.21, EGCOKE-BATTERY, Part III.A.3.5</p>	<p>Air pollution control equipment monitoring and record keeping requirement was added for the baffles for the quench tower as the basis of compliance for condition V.8</p>
<p>18. Table E-01.21, EGCOKE-BATTERY, Part III.B.1.C and B.3.C</p>	<p>Testing requirement was added for the total dissolved solids content of the quench water as the basis of compliance for condition V.9.</p>
<p>19. Table E-01.21, EGCOKE-BATTERY, Part III.B.3.D</p>	<p>Testing requirement was added for the hydrogen sulfide content of the fuel gases fired in the No. 5 coke battery as the basis of compliance for condition V.11.</p>
<p>20. Table F-01.01, FGBHZI-3-BLRHSE, Part V.1 and 2</p>	<p>Permit to Install requirements cover Boilers NO. 1 and 2, Boiler No. 2 was added as it was inadvertently omitted.</p>
<p>21. Table F-01.07, FG2BOP-SHOP,Part III.A.2.2 and Part V.2</p>	<p>Deleted since conditions are already covered in Table E-01.17, EG2BOF-CHARGING.</p>
<p>22. Table F-01.07, FG2BOP-SHOP,Part VI.2</p>	<p>The condition was modified to make Appendix C in the condition be a stand alone documents. Since Appendix C contains a lengthy list of equipment which are in constant state of flux, making it a stand alone document in the condition will allow it to be revised to reflect current inventory without a modification of the Title V Permit. The condition was also added with language that would allow appropriate revisions to the stand alone documents with the approval of the AQD District Supervisor.</p>
<p>23. Table F-01.11, FG2BOF-TAPPING, Part III.B.1-3</p>	<p>Requirement for particulate stack testing was removed since it is already covered under E-01.18, Part III.B.1-3.</p>
<p>24. Table F-02-01, FGCOKESCREENHANDLING, Part IV.4</p>	<p>Reporting condition was added as required under Consent Order SIP 8-1993, Revised 9/9/94.</p>
<p>25. Appendix 1-2. Schedule of Compliance</p>	<p>Schedule of Compliance with details summarized in table form was added.</p>
<p>26. Table E-01-21, EGCOKE-BATTERY, and Table E-01-22, EGCOKE-BYPRODUCT</p>	<p>These Tables were removed from Section 1 of this ROP and were made Table E-07-01 and Table E-07-02 respectively in Section 7 of this ROP.</p>
<p>27. SECTION 7</p>	<p>DTE Energy Services currently owns the No. 5 Coke Battery and the No. 3 Coke By-product Plant and operated by USSGLW. A separate section was requested by USSGLW to be created for the No. 5 Coke Battery and the No. 3 Coke Plant By-product Plant to reflect the current contractual arrangement between the two companies. USSGLW remains responsible for compliance of operations and equipment under Section 7 of this ROP.</p>

Emission Unit or Flexible Group ID	Changes Made
<p>28. Table E-01.08, EG5-PICKLE-LINE, Part I.B; Part II.B.1,2, and 3; Part III.A.2; Part V.1-4</p>	<p>Conditions were removed and replaced with new and modified conditions to reflect the new issued permit to install No. 103-03 which voided the old permits to install. Also to reflect some conditions and standards of MACT for Pickle Line Operations for clarity according to the permittee's request. For Part II. A.2, the pressure drop range was changed from 5.5 - 9.5 range to 3 -10 range to reflect what is contained in the company's Operating and Maintenance Procedure as required in the MACT.</p>



State Registration Number

A7809

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number

199600132

August 16, 2004 STAFF REPORT ADDENDUM

Purpose

A Staff Report dated July 28, 2003, 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 include changes in response to USEPA's comments from the 45-day EPA Comment period. Also included are changes on the Proposed ROP to include comments from Karen Kajiya Mills, Laboratory Scientist, AQD Compliance Support Unit with approval for inclusion by the permittee and USEPA.

General Information

Responsible Official:	<p>Section No. 1 United States Steel, Great Lakes Works Fred T. Harnack, General Manager Phone: 313-749-2210</p> <p>Section No. 2 Delray Connecting Railroad Company Michael Moss Phone: 412-433-3109</p> <p>Section No. 3 International Mill Services, Inc Michael Connolly, Director Environmental Engineering Phone: 215-956-5618</p> <p>Section No. 4 Great Lakes Recovery System, Inc James F. Torok, VP, Operations & Technology Phone: 219-392-1401</p> <p>Section No. 5 Edison Energy Services Fred T. Harnack, General Manager Phone: 313-749-2210</p> <p>Section No. 6 AKJ Industries, Inc John Bielich, VP, Steel Operations Phone: 412-233-7222.</p> <p>Section No. 7 DTE Energy Services Fred T. Harnack, USSCGLW General Manager</p>
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	Phone: 313-749-2210
AQD Contact:	Bernardo B. Sia, Senior Environmental Engineer Phone: 734-953-1416

Staff Report Regulatory Analysis

As of June 15, 2004, Wayne County has been designated by EPA as a moderate nonattainment area with respect to the 8-hour ozone standard.

Changes to the June 23, 2004 Proposed ROP

Emission Unit or Flexible Group ID	Changes Made
1. Table E-01.01, EGBHZI3-2-BOILER, Part II.A	R336.1201(3) was added as the applicable requirement for the Material Usage Rate in response to EPA's comment.
2. Table E-01.02, EGBHZI3-1-BOILER, Part II.A	R336.1201(3) was added as the applicable requirement for the Material Usage Rate in response to EPA's comment.
3. Table E-01.08, EG5-PICKLE-LINE, Part II.B.2	"HCl at mass emission rate that corresponds to a collection efficiency of less than 97 percent" was added as condition as part of the requirements under 40 CFR Part 63, Subpart CCC. This is in response to EPA comment.
4. Table E-01.08, EG5-PICKLE-LINE, Part VI.3.vi	"Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of this subpart." was added to the condition to complete the requirement under 63.1160(2)(vi), Subpart CCC. This is in response to EPA comment.
5. Table E-07.01, EGCOKE-BATTERY, Part III.A.2.12-14	In order to know that COMS are working properly, Conditions Nos. 12, 13, and 14 were added per recommendation of Karen Kajiya of the AQD Compliance Support Unit. The permittee and EPA gave its approval for inclusion of the conditions to the ROP.
6. Table E-07.01, EGCOKE-BATTERY, Part IV.7 and 8	In order to know that COMS are working properly and monitor the COMS performance, Conditions Nos. 7 and 8 were added per recommendation of Karen Kajiya of the AQD Compliance Support Unit. The permittee and EPA gave its approval for inclusion of the conditions to the ROP.



State Registration Number

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Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number

199600132a

October 27, 2005 STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION

Purpose

On March 1, 2005, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600132 to United States Steel Corporation Great Lakes Works 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:	Mr. Gary L. Gross, General Manager, EES Coke Battery, LLC
AQD Contact:	Lori L. Myott, Senior Environmental Engineer 517-373-7082
Application Number:	
Date Application For Minor Modification Was Submitted:	August 8, 2005

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 following changes were made to the ROP:

1. Section 7, Table F-07.01 V.A.1.—Add calcium chloride and magnesium chloride as acceptable dust control materials to be used on unpaved roads. Calcium chloride and magnesium chloride are both considered acceptable fugitive dust control compounds and have been allowed at other fugitive dust sources.
2. Section 7, Table F-07.01 V.A.2.—Add the requirement to use the manufacturer recommended dilution ration and application rate when using calcium chloride or magnesium chloride. The dilution rate of 7 parts water per1 part suppressant and application rate of 0.83 gallon solution per square yard is specific to Road Pro and is not appropriate for other dust suppressants.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the change at the time 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.199600132, 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 Permit Section 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
A7809

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600132a

**January 10, 2006 STAFF REPORT ADDENDUM FOR
RULE 216(2) MINOR MODIFICATION**

Purpose

A Staff Report dated October 27, 2005, 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:	Mr. Gary L. Gross, General Manager, EES Coke Battery, LLC
AQD Contact:	Lori L. Myott, Senior Environmental Engineer 517-373-7082

Summary of Pertinent Comments

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

Changes to the Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.



State Registration Number
A7809

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600132b

**March 31, 2006 STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION**

Purpose

On March 1, 2005, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600132 to United States Steel Corporation, Great Lakes Works Coke, Iron and Steel Manufacturing Operations 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:	Mr. Gary L. Gross, General Manager, EES Coke Battery, LLC
AQD Contact:	Jim Donaldson, Permit Engineer 517-241-7470
Application Number:	200600041
Date Application For Minor Modification Was Submitted:	March 3, 2006

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 following changes were made to the ROP:

1. Section 7, Table E-07.01 Emission Group Description—Replace reference to coke screening baghouse with chemical dust suppressant system.
2. Section 7, Table E-07.01 III.A.3.15—Add condition requiring monthly monitoring and recordkeeping of the amount of chemical dust suppressant used in the coke screening building.
3. Section 7, Table E-07.01 III.A.3.16—Add condition requiring monthly and previous 12-month records of dust suppressant system malfunction alarm occurrences and corrective action taken.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the change at the time 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. 199600132b, 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 Permit Section 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

A7809

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number

199600132b

June 1, 2006 STAFF REPORT ADDENDUM FOR RULE 216(2) MINOR MODIFICATION

Purpose

A Staff Report dated March 31, 2006, 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:	Mr. Gary L. Gross, General Manager, EES Coke Battery, LLC
AQD Contact:	Jim Donaldson, Permit Engineer 517-241-7470

Summary of Pertinent Comments

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

Changes to the Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.



State Registration Number

A7809

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number

199600132c

October 11, 2006 STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT

Purpose

On March 1, 2005, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600132 to United States Steel Corporation Great Lakes Works 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:	Frederick G. Jauss
AQD Contact:	Cari DeBruler, Secretary 517-335-4607
Application Number:	200600136
Date Application For Administrative Amendment Was Submitted:	September 25, 2006

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

Emission Unit

Changes made to ROP

(No.1 Baghouse)
EG2BOF-Charging

Changed to read "The permittee shall conduct a particulate emission test from the No. 1 Baghouse at the No. 2 BOP every other year beginning in 1998..."

(Electrogalvanizing Line Operations)
EGEGL-OPERATIONS

Changed to read "Electrogalvanizing line operations, consists of the following:(a. uncoiler, b. precleaning, c. plating tanks, d. recoiler, e.fume collectors). Fume scrubbers associated with the operations is (1) De-greasing Unit Scrubber (exempt), (2) pre-treatment scrubber (east), (3) post-treatment scrubber (west), (4) Boiler (insignificant source)."

Main Plant Fugitive Dust

Deleted C.1 Requirements for Michigan Steel

Boiler No. 1 at No. 3 Boiler House, Zug Island

Changed Emission Group to read "EGBHZ13-1-BOILER"

Boiler No. 2 at No. 3 Boiler House, Zug Island

Changed Emission Group to read "EGBHI3-2-BOILER"

D Blast Furnace Casthouse	Changed Maximum Exhaust Dimension to 130 inches
Boilerhouse No. 1 and 2	Changed Emission Unit/Process Groups to EGBHZI2-3-BOILER, EGBHZI2-4-BOILER, EGBHZI2-5-BOILER.
Zug Island Fugitive Dust	Deleted D. Unloading or Loading of Open Storage Piles
Zug Island Fugitive Dust	Deleted E. Storage Piles
Zug Island Fugitive Dust	Deleted F. Outdoor Conveying Transfer Points
Zug Island Fugitive Dust	Deleted G.1.a for Breeze and G.1.c for Lump Ore
Zug Island Fugitive Dust	Deleted G.5.c., d., f., and g.
Zug Island Fugitive Dust	Changed references from Great Lakes Steel to Great Lakes Works.
Pulverized Coal Transport System	Changed the DP range from 5" to 9" to 0.0" to 3.5".
Blast Furnace Cooling Tower	Deleted sentence regarding test protocol.
Vacuum De-gassing Operation, Package Steam Boiler – Main Plant	Changed III.A..2.3 to read "Emission rate calculation monthly of pollutants mentioned in II.B. 1-3 of this permit using PTI emission factor.

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. 199600312c, as requested by the stationary source. The delegated decision maker for the AQD is the Permit Section Supervisor.



State Registration Number
A7809

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600132d

**January 12, 2007 STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION**

Purpose

On March 1, 2005, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. 199600132 to United States Steel Corporation Great Lakes Works 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:	Fred G. Jauss, General Manager
AQD Contact:	Jeremy Hoeh, Permit Engineer 517-241-2194
Application Number:	200600105
Date Application For Minor Modification Was Submitted:	July 20, 2006

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).

The stationary source has requested that Permit to Install (PTI) No. 219-06, issued on August 16, 2006, be incorporated into their ROP. The AQD has determined that the change requested meets the following criteria for a Minor Modification pursuant to Rule 216(2). The PTI includes terms and conditions that comply with the permit content requirements contained in Rule 213 and none of the provisions of Rule 216(2)(a) apply.

Description of Changes to the ROP

The minimum scrubbing water flow rate requirement for the cross flow packed bed scrubber in ROP Table E-01.11 was decreased from 50 gallons per minute (gpm) to 30 gpm. The change will not cause non-compliance with the particulate emission limit and will not result in any increase in emissions.

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.199600132c, 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 Permit Section 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
A7809

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number
199600132d

**March 6, 2007 STAFF REPORT ADDENDUM FOR
RULE 216(2) MINOR MODIFICATION**

Purpose

A Staff Report dated January 12, 2007, 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:	Fred G. Jauss, General Manager
AQD Contact:	Jeremy Hoeh, Permit Engineer 517-241-2194

Summary of Pertinent Comments

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

Changes to the January 12, 2007 Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.