

State Registration Number  
M4174

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-M4174-2020

**Detroit Metropolitan Wayne County Airport**

State Registration Number (SRN): M4174

Located at

11050 Rogell Drive, Romulus, Wayne County, Michigan 48242

Permit Number: MI-ROP-M4174-2020

Staff Report Date: September 21, 2020

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) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), 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  
Environment, Great Lakes, and Energy  
Air Quality Division

State Registration Number

M4174

## RENEWABLE OPERATING PERMIT

ROP Number

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### September 21, 2020 STAFF REPORT

#### 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; and Michigan's Administrative Rules for Air Pollution Control promulgated under 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:	Detroit Metropolitan Wayne County Airport Wayne County Airport Authority 11050 Rogell Drive, Building 602 Romulus (Detroit), Michigan 48242
Source Registration Number (SRN):	M4174
North American Industry Classification System (NAICS) Code:	488119
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201400145
Responsible Official:	Bryan Wagoner, Director, Department of Environment & Sustainability 734-247-3686
AQD Contact:	Rebecca Loftus, Senior Environmental Quality Analyst 313-316-7634
Date Application Received:	September 9, 2014
Date Application Was Administratively Complete:	September 9, 2014
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	September 21, 2020
Deadline for Public Comment:	October 21, 2020

## **Source Description**

The Detroit Metropolitan Wayne County Airport (hereinafter "Airport") is a full-service commercial and private airport that began operations in 1930. The land that comprises the Airport complex covers several square miles and is currently bounded by Interstate 94 to the north, Middlebelt Road to the east, Eureka Road to the south, and Vining Road to the west. The mailing address is 11050 Rogell Drive, Building 602, Detroit, Michigan, 48242, however, the Airport complex is located within the boundaries of the City of Romulus.

Operations at the Airport are under the control of the Wayne County Airport Authority (WCAA). The Authority consists of an advisory board whose members are appointed by both the State of Michigan's and Wayne County's governing bodies.

The Airport property contains many buildings and operations serving a wide array of functions. These include: buildings/operations owned and operated by the Airport Authority and/or Wayne County, buildings/operations owned and operated by the various airlines doing business at the Airport, buildings/operations that provide support services to the airport, the various airlines, or both. Many of these buildings/operations have been in existence for many years and were built at various stages in the Airport's existence.

The Department of Environment, Great Lakes, and Energy's (EGLE) Air Quality Division (AQD) considers the buildings and operations owned and operated by the various airlines, commercial and institutional entities, and support services (an example being the airline fuel distribution facilities) located at the Airport as separate stationary sources from the buildings and operations operated and controlled by the Wayne County Airport Authority. The discussion that follows addresses the stationary source determination that was made regarding the Airport.

### **The determination of "Stationary Source" for the Airport facility:**

From the perspective of the applicability of air regulations, the Airport has been considered as a grouping of separate stationary sources, which include those that are directly owned, operated and controlled by the Wayne County Airport Authority, and those that are owned, operated and controlled by other entities at the Airport, independent of the Airport Authority, such as Delta Airlines. All of the operations at the Airport are contiguous to one another, and most if not all are located where they are because of the Airport and the role that these operations play in terms of supporting the Airport operations, or receiving support themselves. This would seem to classify all of the operations on the Airport property as a single stationary source.

This issue was examined in an EPA memorandum. The memorandum was drafted in response to a written request dated June 15, 1989 relating to the PSD applicability and permitting requirements associated with the new airport in Denver, CO, which was in the planning stages at that time. The memorandum states in part that:

"...if the SIC Manual grouping was the only criterion to consider, then the airport and all pollutant-emitting activities therein would be considered a single source. However, the definition requires that, for applicability purposes, emissions be aggregated not just on the basis of the SIC code but also based on a determination of "control" of the pollutant-emitting activities at a stationary source."

Based upon this logic, in the case of the Detroit Metropolitan Wayne County Airport, the issue of "control" lies with the owner/operator of each individual business/operation doing business at the Airport complex; the decision to locate there, as well as what type of business to operate, equipment to install, compliance with federal, state and local regulatory requirements, etc., lies entirely with the individual entities, themselves.

The EPA memorandum goes on to state that:

“...In cases where an airport authority (or an equivalent managing entity) acquires property, develops plans, and establishes a contract for the construction of a new airport, the airport authority (or equivalent) would be considered to be in “control” of the airport buildings or facilities for which it establishes a construction contract.”

In the case of Detroit Metropolitan Wayne County Airport, the WCAA was established within the last 15 or so years, well after the property was acquired and plans were made to construct the Airport, and well after most of the other entities doing business at the Airport have been in operation. During past inspection of the Airport, it was explained to the AQD that while environmental staff from the WCAA do have some level of involvement with the other entities (an example being performing inspections to check on storm water management practices at the locations of the other entities), these other entities otherwise operate independently of the WCAA; the other entities control their day to day operations and business decisions, and they are responsible for demonstrating compliance with applicable environmental regulations and requirements at their facilities.

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. The main areas of process equipment within the Airport facility include the following:

Building 821; the DTE Energy Wayne County Midfield Terminal, which used to be known as the Midfield Energy Center. The equipment in this building is part of the Airport complex, but it is operated by DTE Energy; it includes three boilers that are capable of firing natural gas and Jet-A fuel, and three natural gas-fired reciprocating internal combustion engines (RICE). The boilers (which have a maximum heat input capacity of 47 MMBTU/hour when firing natural gas, 45 MMBTU/hour when firing Jet-A) are equipped with low-NOx burners, while the engines, which have a maximum heat input capacity of 48.3 MMBTU/hour, are equipped with catalytic oxidizers. This equipment is represented in the ROP as EU001, EU002, EU003, EU006, EU007, and EU008.

Building 611; Since the last ROP renewal, the Airport has removed the following four boilers: EUBOILER1, EUBOILER2, EUBOILER3 and EUBOILER4. These boilers were replaced with four new boilers: EUNEWBOILER1, EUNEWBOILER2, EUNEWBOILER3, and EUNEWBOILER4. The new boilers are fire tube boilers capable of utilizing natural gas and fuel oil. Each boiler has a steam production capacity of 17,200 pounds per hour of steam, a maximum rated heat input of 20.8 MMBtu/hr when burning natural gas, and a maximum rated heat input of 20.4 MMBtu/hr when burning fuel oil.

Located outside, just south of Building 611 are EUTURBINE and EUGEN: A natural gas-fired combustion turbine and an associated diesel-fired engine generator that is used as a starter engine for the turbine. The turbine is rated at 145 MMBTU/hour, and is equipped with SoLoNOx dry low emissions combustion system to reduce NOx emissions. The turbine is rated at 1,482 brake horsepower, and is equipped with a turbocharger to minimize emissions of NOx and maximize power output.

Other Emission Units contained within the ROP include ten natural gas fired boilers of various sizes, multiple diesel, gasoline, and natural gas-fired generators of various sizes (most used for emergency purposes), five underground gasoline storage tanks, a small paint booth for maintenance type activities, and three cold cleaners. Note, diesel fuel is also stored on-site in seven underground storage tanks whereas Jet -A fuel is stored and delivered by Swissport Fuel Services (SRN: N6544).

Emissions from the process equipment at the Airport mainly consist of carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOCs), and particulate matter (PM).

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2019**.

**TOTAL STATIONARY SOURCE EMISSIONS**

Pollutant	Tons per Year
Carbon Monoxide (CO)	4.08
Lead (Pb)	0.00005
Nitrogen Oxides (NO <sub>x</sub> )	15.80
Particulate Matter (PM)	1.17
Sulfur Dioxide (SO <sub>2</sub> )	0.13
Volatile Organic Compounds (VOCs)	1.02

For 2018 Metro Airport reported Total Hazardous Air Pollutants (HAPs) as 0.374 Tons for the following equipment categories: internal combustion, natural gas reciprocating internal combustion, diesel reciprocating internal combustion, turbines, fuel dispensing, and the paint booth.

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 an area of Wayne County which is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard. A portion of Wayne County is also currently designated by the USEPA as a non-attainment area with respect to the SO<sub>2</sub> standard; this stationary source is not located in this portion of Wayne County.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of nitrogen oxides and carbon monoxide exceeds 100 tons per year and 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 and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations of The Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of nitrogen oxides and carbon monoxide to less than 250 tons per year.

EU006, EU007, EU008, EUNEWBOILER1, EUNEWBOILER2, EUNEWBOILER3, and EUNEWBOILER4 at the stationary source are subject to the Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Dc; applicable requirements can be found in the ROP under flexible groups FG002 and FGNEWBOILERS.

EUNEWBOILER1, EUNEWBOILER2, EUNEWBOILER3, EUNEWBOILER4, EU006, EU007, EU008, EU012, EU013, EU016, EUBLD802BOILER (EU017), EUBLD704H2OHEAT, EUBLD825MACDECK at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers promulgated in 40 CFR Part 63, Subparts A and DDDDD. In the 2019 Subpart DDDDD Annual Report, dated January 17, 2019, the Airport indicated that the boilers only burned Gas 1 as fuel in 2019. Based on this information, applicable requirements have been added to the ROP during this renewal and can be found in the following flexible groups: FG002,

FGNEWBOILERS, and FGEXNATGASBOILERS. If the Airport uses Jet-A fuel at any time, they must comply with all applicable provisions of Subpart DDDDD.

EU001, EU002, EU003, EUGEN, EU009, EUENGINE2, EUENGINE4, EUENGINE9, EUENGINE13, EUENGINE14, EUENGINE15, EUENGINE17, EUENGINE21, EUENGINE22, EUENGINE27, EUENGINE28, EUENGINE29, EUENGINE43, EUENGINE44, EUENGINE45, EUENGINE46, EUENGINE47, EUENGINE48, EUENGINE49, EUENGINE50, EUENGINE51 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ. Applicable requirements have been added to the ROP during this renewal and can be found in the following emission unit tables and flexible groups: EUGEN, EU009, EUENGINE2 FGMETROENERGYENGINES, FGZZZEXISTINGRICE>500, FGEXEMERGENCYRICE≤500, FGSUBPARTIIIIENGINES, and FGSUBPARTJJJJENGINES.

EUGEN, EUENGINE27, EUENGINE28, EUENGINE43, EUENGINE49, and EUENGINE50 at the stationary source are subject to the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and IIII. Applicable requirements have been added to the ROP during this renewal and can be found in the following emission unit table and flexible groups: EUGEN and FGSUBPARTIIIIENGINES.

EUENGINE29 at the stationary source is subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and JJJJ. Applicable requirements have been added to the ROP during this renewal and can be found in flexible group: FGSUBPARTJJJJENGINES.

Underground gasoline storage tanks: EUBLDG358TANK, EUBLDG601TANK, EUBLDG703TANK, and EUBLDG802TANK are subject to Michigan's Air Pollution Control Rules, specifically R 336.1703; applicable requirements can be found in the ROP under flexible group FGFUELDISPENCING.

In addition, applicable State requirements for a maintenance paint booth (EUPAINTNBOOTH) and three cold cleaners (EUCOLDCLEANERS) have been added to ROP under flexible groups FGRULE287(2)(c) and FGCOLDCLEANERS.

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."

#### Compliance Assurance Monitoring

The emission limitation(s) or standard(s) for carbon monoxide from EU001, EU002, and EU003 at the stationary source are subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR Part 64. These emission units each have a control device and potential pre-control emissions of carbon monoxide greater than the major source threshold level. The pre-control potential to emit for volatile organic compounds (VOCs) is less than the major source threshold; therefore, the VOC limits are not subject to CAM requirements.

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM?
EU001, EU002, EU003	CO 0.17 lb/MMBtu (limit applies to each engine individually)	R 336.1205(1)(a), R 336.1205(3)	Catalytic oxidizers	Catalyst Bed Inlet and Outlet Temperatures; the outlet temperature must be greater than the inlet temperature for proper operation.  Catalyst Bed Temperature; the indicator range is >572°F and less than 1112°F or as identified in the MAP.	FG001	No

\*Presumptively Acceptable Monitoring (PAM)

EU001, EU002, and EU003 each have a Süd-Chemie DO 6 oxidation catalyst which are used to control CO (and VOC) emissions. According to the manufacturer, the control efficiency may be as high as 87.9%. The manufacturer recommends that the temperature before the catalyst be higher than 300°C (572°F) and a maximum of 600°C (1112°F).

In addition to catalyst operating temperature, temperature is continuously measured at the inlet and the outlet. The temperatures are recorded once per day when an emission unit is operating. To ensure the oxidation catalyst is functioning, the temperature should increase between the inlet and the outlet. The temperature range on the thermocouple on the unit is -454°F to 2300°F, but typical temperatures will be ambient (when unit is off) up to 1112°F. An excursion is defined as an outlet temperature less than inlet temperature. Excursions trigger an inspection, corrective action, and a reporting requirement.

EU001, EU002, and EU003 will comply with the CO emission limits provided that the catalyst material is not compromised and is operating properly. Because the catalyst bed is passive in nature, the catalyst bed will function properly provided that:

- (1) The temperature of the exhaust gas is sufficient (i.e., greater than 572°F) to provide and sustain a high degree of CO conversion to carbon dioxide (CO<sub>2</sub>) and water, and
- (2) The number and distribution of “active sites of the catalyst material are not compromised due to poisoning with metals, masking of the active sites with particulate matter, or thermal degradation of the catalyst. Triannual visual inspections of the catalyst will ensure that the catalyst is free of deposits and/or blockages.

Monitoring of exhaust gas temperature at the inlet to the catalyst bed ensures that the exhaust gas temperature is sufficient to sustain a high degree of CO conversion to carbon dioxide (CO<sub>2</sub>) and water.

These indicators, in conjunction with proper maintenance and periodic performance testing, are used to demonstrate compliance with the CO emission limits.

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-M4174-2010 are identified in Appendix 6 of the ROP.

PTI Number		
C-09729	385-99A	204-04
C-09730	385-99B	204-04A
385-99	385-99C	87-07

**Streamlined/Subsumed Requirements**

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

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212 Citation	PTI Exemption Rule Citation
EUBLD704UNTREAT1	Absolute air unit heater located in DTW Building 704, firing natural gas, rated at 1.005 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD704UNTREAT2	Absolute air unit heater located in DTW Building 704, firing natural gas, rated at 0.94 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD704UNTREAT3	Eleven Absolute air unit heaters located in DTW Building 704, firing natural gas only, each rated at 1.053 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD704AC/UTHT1	Carrier AC/unit heater located in DTW Building 704, firing natural gas only, rated at 0.27 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD704UC/HT2	Carrier AC/unit heater located in DTW Building 704, firing natural gas only, rated at 0.115 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD704UNTREAT4	Reznor unit heater located in DTW Building 704, firing natural gas only, rated at 0.1155 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD704UNTREAT5	Two Reznor unit heaters located in DTW Building 704, firing natural gas only, each rated at 0.132 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD704UNTREAT6	Ten Reznor unit heaters located in DTW Building 704, firing natural gas only, each rated at 0.13 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212 Citation</b>	<b>PTI Exemption Rule Citation</b>
EUBLD704UNTHEAT7	Eight Captive Air unit heaters located in DTW Building 705, firing natural gas only, each rated at 1.394 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD803HEATER	Air Wise indirect fired heater located in DTW Building 803, firing natural gas only, rated at 1 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD358HEAT/AC1	Two heater/AC units located in DTW Building 358, firing natural gas only, each rated at 0.18 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD358HEAT/AC2	Two heater/AC units located in DTW Building 358, firing natural gas only, each rated at 0.27 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD527UNITHEAT	Modine unit heater located in DTW Building 527, firing natural gas only, rated at 0.17 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD703UNTHEAT1	Absolute air unit heater located in DTW Building 703, firing natural gas only, rated at 0.567 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD703UNTHEAT2	Absolute air unit heater located in DTW Building 703, firing natural gas only, rated at 0.81 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD703AC/UHEAT	Carrier AC/unit heater located in DTW Building 703, firing natural gas only, rated at 0.144 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD703UNTHEAT3	Reznor unit heater located in Building 703, firing natural gas only, rated at 0.35 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD703UNTHEAT4	Fourteen Reznor unit heaters located in DTW Building 703, firing natural gas only, each rated at 0.132 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD825HEAT	Eight Re-Verber-Ray inferred heaters, natural gas fired, each rated at 0.15 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD509HEAT	Trane PKG roof top unit, natural gas fired, rated at 0.10 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD737HEAT	Fraser Jonson furnace, natural gas fired, rated at 0.10 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD738HEAT	Two Reznor air heaters, natural gas fired, each rated at 0.40 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD739HEAT	Two Reznor unit heaters, natural gas fired, each rated at 0.03 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBLD601DIESEL	One 10,000 gallon diesel underground storage tank	R 336.1212(3)(e)	R 336.1284(2)(d)
EUBLD603DIESEL	One 3,000 gallon diesel underground storage tank	R 336.1212(3)(e)	R 336.1284(2)(d)
EUBLD611DIESEL	One 15,000 gallon diesel underground storage tank	R 336.1212(3)(e)	R 336.1284(2)(d)
EUBLD703-1DIESEL	One 10,000 gallon diesel underground storage tank	R 336.1212(3)(e)	R 336.1284(2)(d)
EUBLD703-2DIESEL	One 20,000 gallon diesel underground storage tank	R 336.1212(3)(e)	R 336.1284(2)(d)
EUBLD802-1DIESEL	One 12,000 gallon diesel underground storage tank	R 336.1212(3)(e)	R 336.1284(2)(d)
EUBLD802-2DIESEL	One 4,000 gallon diesel underground storage tank	R 336.1212(3)(e)	R 336.1284(2)(d)
EUFIRETRAININGFACILITY	Aircraft Rescue and Fire Fighting Training Facility.	R 336.1212(3)(f)	R 336.1285(2)(ee)
EUFIRETRAINING-PROPANETANK	One above ground 30,000 gallon propane tank.	R 336.1212(4)(d)	R 336.1284(2)(b)
EUENGINE3	Portable, Onan 42247D, 500kW, diesel fueled emergency generator, rated at 755hp. Install Date: 12/01/1999.	R 336.1212(3)(e)	R 336.1284(2)(d)

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212 Citation</b>	<b>PTI Exemption Rule Citation</b>
EUENGINE5	Portable, Onan, 40kW, diesel fueled emergency generator, install date: 12/01/1991.	R 336.1212(3)(e)	R 336.1284(2)(d)
EUENGINE7	Portable, Colman, 17kW, diesel fueled, emergency generator, install date: 12/1/1990.	R 336.1212(3)(e)	R 336.1284(2)(d)
EUENGINE18	Portable, Honda 3500EB, gasoline fueled, generator used to power tools.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE19	Portable, Honda 2000EU 120V, gasoline fueled, generator used to power tools.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE20	Portable, Lombardi 6lb 259cc Arrow board, trailer mounted, diesel fueled traffic signal.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE23	Portable, Wisconsin, trailer mounted, gasoline fueled water pump.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE24	Portable, Wisconsin, trailer mounted, gasoline fueled water pump.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE25	Portable, Muller 8.0, trailer mounted, gasoline fueled water pump.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE26	Portable, Lombardi 6lb 259cc Arrow board, trailer mounted, diesel fueled traffic signal.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE52	Portable, Isuzu Model 4LE1, diesel-fueled 25k W, emergency engine, located at Building 703/Baldor, install date: 12/01/2000.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE53	Portable, Isuzu, Serial Number 4LE2TAGV-03, diesel-fueled emergency engine, 40.2hp @ 1800 rpm, 26 kW, install date:12/01/2016.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE54	Portable, John Deere Model, Serial Number 3029HFG03, diesel-fueled emergency engine, 74 hp @ 1800 rpm, 48 kW, install date:12/01/2016.	R 336.1212(4)(e)	R 336.285(2)(g)
EUENGINE55	Portable, John Deere Model, Serial Number PE6090HFG95, diesel-fueled emergency engine, 440 hp @ 1800 rpm, 294 kW, install date:12/01/2016.	R 336.1212(4)(e)	R 336.285(2)(g)

Note regarding the exempt engines listed above: U.S. The Environmental Protection Agency Applicability Determination Index (ADI), Control Number: M090038, states, in summary, “MACT subpart ZZZZ does not apply to non-road, non-stationary reciprocating internal combustion engines located at a major source of hazardous air pollutants” and “NSPS subpart IIII does not apply to non-road, non-stationary reciprocating internal combustion engines”. According to Metro Airport the above engines meet the definition of “nonroad engine” as defined at 40 CFR 1068.30, are transportable across the airport, and do not remain in any one location for 12 consecutive months. Therefore, based on the information provided by Metro Airport and the conclusion of ADI No. M090038, these engines do not appear to be subject to current federal engine regulations and have not been included in the ROP.

**Draft ROP Terms/Conditions Not Agreed to by Applicant**

This draft ROP 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 EGLE, 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 April Wendling, Detroit 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.

Michigan Department of  
Environment, Great Lakes, and Energy  
Air Quality Division

State Registration Number  
M4174

**RENEWABLE OPERATING PERMIT**

ROP Number  
MI-ROP-M4174-2020

**October 26, 2020 STAFF REPORT ADDENDUM**

A Staff Report dated September 21, 2020, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Bryan Wagoner, Director, Department of Environment & Sustainability 734-247-3686
AQD Contact:	Rebecca Loftus, Senior Environmental Quality Analyst 313-316-7634

**Summary of Pertinent Comments**

No pertinent comments were received during the 30-day public comment period.

**Changes to the September 21, 2020 Draft ROP**

No changes were made to the draft ROP.