

State Registration Number

B1477

RENEWABLE OPERATING PERMIT

JUNE 16, 2020 - STAFF REPORT ADDENDUM

ROP Number

MI-ROP-B1477-
2020

Purpose

A Staff Report dated May 4, 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:	Jeffery Scott, Plant Manager 989-916-9637
AQD Contact:	Kurt Childs, Senior Environmental Quality Analyst 231-878-2045

Summary of Pertinent Comments

No comments were received from the general public. Comments were received from both Holcim (US) Inc. d/b/a Lafarge Alpena Plant and the US EPA Region 5 office. Comments from the Company and from EPA and the ensuing changes are identified in the "Changes to the Draft ROP" section.

Changes to the 5/05/2020 Draft ROP

Comments from Holcim (US) Inc. d/b/a Lafarge Alpena Plant resulted the following changes:

1. FGMACKILNS IV.7: The special condition language was changed to include PC MACT allowance of SO2 surrogate monitoring for HCL.
2. Appendix 3.1: Request to revise clinker monitoring plan.

Review of this request and the requirements under the National Emission Standards for Hazardous Air Pollutants for Portland Cement Plants indicated the change could not be made at this time. The company was notified this change requires a detailed written request to change the method for calculating clinker production and may be approved in the future based on such a submittal.

3. Appendix 3.1: "FG MACT KILNS" was added to the list of Flex Groups.
4. Appendix 3.5: Company comments regarding visible emission monitoring lead to the discovery that there was a conflict between Special Condition VI.1 in FG FINISH MILLS and the referenced Appendix 5. The special condition referenced 40 CFR 63.1350(f)(2) but Appendix 3.5 contained the language from 40 CFR 63.1350(f)(1). As it turns out, both regulations are applicable to FG FINISH MILLS (and FG RAW MILL SYS) depending on the specific piece of equipment being monitored.

As a result underlying applicable requirements in SC VI.1 of FG FINISH MILLS and FG RAW MILL SYS were changed to reference both regulations. Additionally Appendix 3.6 was added to contain the requirements of 40 CFR 63.1350(f)(2).

The United States Environmental Protection Agency provided comments during the public comment period that resulted in the following changes:

1. The Fugitive Dust Plan must be updated to include fugitive dust control measures for EUPORTCRUSH.

EU PORTCRUSH was added to the ROP as the result of the issuance of Permit to Install 155-19 which occurred after the initial submittal of the ROP Renewal application and existing plans. Holcim (US) Inc. d/b/a Lafarge Alpena Plant is aware of this requirement and is undertaking changes to the Fugitive Dust Plan.

2. EU PORTCRUSH SC III.3: A change to the underlying applicable requirement was suggested and reviewed.

The underlying applicable requirement was changed from 40 CFR 60.672(a) to 40 CFR 60.672(b) to reflect that the emissions limit and control are for a fugitive source not an exhaust stack.

3. FG QUARRY SC III.1: A change to the underlying applicable requirement was suggested and reviewed.

The underlying applicable requirement was changed from 40 CFR 60.672(a) to 40 CFR 60.672(a) & (b) to reflect that the emissions limit and control are for both a fugitive source and an exhaust stack.

4. FG FINISH MILLS: The Staff Report should indicate which pollutant specific emission units are subject to CAM.

5. The Staff Report identified the 44 tpy PM-10 emission limit applicable to the EU BALL MILL 20 & 21 Separators as CAM subject. FG FINISH MILLS also contains a 10 pound per hour PM-10 emission limit and a 0.15 lb./10000 lbs of exhaust gases PM limit for the separators that should have been identified as CAM subject as well.

FG FINISH MILLS: Revise the permit as necessary to ensure that the permit identifies the monitoring requirements for EU BALL MILL 20 and EU BALL MILL 21 that are used to determine compliance with each CAM-subject PM and PM-10 emission limit, in accordance with 40 CFR 64.2(b), 40 CFR 70.6(a)(1), 40 CFR 70.6(a)(3)(i)(A), and 40 CFR 70.6(c)(1).

I added the language “to demonstrate continuous compliance with the emission limits in Special Conditions I.3,6,&7” to Special Condition VI.6 in order to address this concern.