

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

**RENEWABLE OPERATING PERMIT**

ROP Number

B4252

January 26, 2018 STAFF REPORT ADDENDUM

MI-ROP-B4252-20XX

**Purpose**

A Staff Report dated December 4, 2017, was developed in order to set forth the applicable requirements and factual basis for the Draft 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:	Jon Harner, Nuclear Environmental Manager 269-465-5901
AQD Contact:	Matt Deskins, Environmental Quality Analyst 269-567-3542

**Summary of Pertinent Comments**

The AQD received comments during the 30-day public comment period from the USEPA, the Facility, and a citizen. The comments from the citizen were mainly related to things that the AQD does not have regulatory authority of, and did not pertain directly to the equipment or conditions contained in the ROP. Therefore, those comments will not be included here. The AQD did address their comments, however, and referred them to the appropriate regulatory authority for further information. The following will list the comments made by the USEPA and the Facility followed by the changes made to the ROP.

**USEPA COMMENT 1:** EU-BOILER1, page 16: SC I.6 lists 40 CFR § 60.43c as an underlying applicable requirement. Please verify the applicability of the opacity limit contained in 40 CFR § 60.43c.

**MDEQ Changes Made:** The reference to 40 CFR 60.43c was removed since it is not applicable.

**USEPA COMMENT 2:** EU-BOILER1, page 16: The SO<sub>2</sub> and NO<sub>x</sub> ton per year limits in SC I.2 and I.4 reference SC VI.5 as the monitoring/testing method. SC VI.5, however, requires the recordkeeping for Arsenic, Cadmium, and Chromium concentrations in the blended fuel oil tanks. Please review the testing/monitoring method for SC I.2 and I.4 and revise as appropriate. Note that SC VI.4 requires 12-month rolling emissions calculations.

**MDEQ Changes Made:** The monitoring/testing method for SC I.2 and I.4 was changed from SC VI.5 to SC VI.4.

USEPA COMMENT 3: EU-BOILER1, page 17: SC V.2 references the blend limits specified in SC II.6, a condition that is not contained in the Draft permit. Please review this reference and revise accordingly.

**MDEQ Changes Made:** The Table referenced in SC V.2 was changed to reflect SC II.5; not SC II.6.

AEP Cook Nuclear Comment 1: Flexible Group EMERDIESELS Section III, Condition 1 (Page 20).

After reviewing the MACT ZZZZ rule language and this language, we believe that the language in Condition III.1 in this section should be better aligned with the language under FG-MACTZZZZ III.1(a)(i) to eliminate the potential issues that the slightly different language potentially brings. To accomplish the alignment, we recommend the following language change to Condition III.1 under FG-EMERGIESELS:

### III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Applicant shall not operate the emergency generators in FG-EMERDIESELS when electric power is available, except during periods of maintenance checks, ~~and~~ operator training, **and readiness testing under the plant Technical Specifications and/or NRC requirements.**

**MDEQ Changes Made:** The above language was added to the condition for consistency with the requirements of the MACT ZZZZ.

AEP Cook Nuclear Comment 2: EU-BOILER1 Section V Condition 2 (Page 17)

In reviewing this condition, we note that it references SC II.6 as it relates to contaminant concentrations in specification recycled used oil (RUO) that may be combusted in the boiler. In reviewing Section II under EU-Boiler, we cannot find a Condition 6 in this section of the Permit. In looking at Section II under EU-Boiler and the context of the SC V.2, we believe that the reference in SC V.2 should be to SC II.5 under EU-Boiler. Based on our assumption of the intended meaning, we recommend the following change to SC V.2:

2. The permittee shall sample blended fuel oil after each addition of the specification RUO to the blend tanks. Sampling of the blended fuel oil shall not be required if the sampling results of the specification RUO are below the blend limits specified in SC II.6<sup>2</sup> **(R336.1205, R336.1225)**

**MDEQ Changes Made:** This comment was also made by the USEPA and was addressed above under the USEPA Comments.

### **Changes to the December 4, 2017 Draft ROP**

See changes that were made above following the comments made by the USEPA and the Facility.