

State Registration Number

A6220

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

MI-ROP-A6220-2021

Intertape Polymer Group

State Registration Number (SRN): A6220

Located at

317 Kendall Avenue, Marysville, Saint Clair County, Michigan 48040

Permit Number: MI-ROP-A6220-2021

Staff Report Date: July 5, 2021

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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RENEWABLE OPERATING PERMIT

JULY 5, 2021 - STAFF REPORT

ROP Number

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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:	Intertape Polymer Group 317 Kendall Avenue Marysville, Michigan 48040
Source Registration Number (SRN):	A6220
North American Industry Classification System (NAICS) Code:	322220
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900119
Responsible Official:	Brian Newman, Operations Manager 810-941-6371
AQD Contact:	Adam Bognar, Environmental Engineer 586-854-1517
Date Application Received:	July 12, 2019
Date Application Was Administratively Complete:	July 12, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	July 5, 2021
Deadline for Public Comment:	August 4, 2021

Source Description

Intertape Polymer Group (IPG) is located at 317 Kendall Avenue, Marysville, Michigan. The facility is located in a predominately industrial area. It is surrounded by industrial properties on the west and south ends of the plant and by residential properties to the north and east. The closest residential property is approximately 200 feet from this facility. The facility produces pressure sensitive adhesive tape products. In general, the production of tape involves preparing an adhesive coating out of raw materials, applying this adhesive coating to a substrate in continuous web coating lines, then drying/curing the tape in ovens. The substrate is shipped to IPG in rolled form and may consist of paper, plastic, and other materials. The adhesive manufacturing steps are batch operations while the coating application and drying operations are continuous. The facility consists of three primary web coating lines controlled by a vapor-phase carbon adsorption solvent recovery system (SRS) and a regenerative thermal oxidizer (RTO); a pilot web coating line and R&D web coating line both controlled by the RTO; a dry stock mixing area controlled by two fabric filter collectors; a research and development spray booth; cold cleaners; and affiliated process operations including dissolution of the adhesive dry stock (wet mix), whipping of adhesive, and storage (tote tanks) and delivery of adhesive to coaters (whip room).

In 2015, IPG began shipping a portion of the adhesives manufactured at the IPG Marysville facility to other IPG facilities for use or repackaging. The adhesives being shipped off site are the same or similar to those used in the IPG Marysville coating lines. They are prepared using existing equipment and required no modifications to the existing adhesive mixing operations. The existing adhesive mixing equipment is considered an affiliated operation under 40 CFR Part 63 Subpart JJJJ – National Emission Standards for Paper and Other Web Coating (MACT JJJJ) when used to manufacture adhesives used in IPG Marysville web coating machines. The National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing promulgated in 40 CFR Part 63, Subpart HHHHH (MCM MACT) do not apply to affiliated operations under MACT JJJJ, however, when IPG Marysville began manufacturing adhesives for other IPG facilities these operations could no longer be considered affiliated with MACT JJJJ and the web coating process at IPG Marysville.

IPG discovered through an internal audit in 2019 that the adhesive manufacturing operations became subject to the MCM MACT in 2015 when they began sending adhesives to other IPG facilities. At that time, the facility was not operating in compliance with the MCM MACT. IPG reported this issue to EGLE-AQD in June 2019. EGLE-AQD issued a notice of violation to IPG on July 3, 2019 for failing to notify EGLE-AQD of the MCM MACT applicability in a timely manner. In response to this violation, IPG and EGLE-AQD entered into a legally binding agreement (Consent Order No. 2020-14) on September 10, 2020. Consent Order No. 2020-14 includes a compliance plan and a monetary penalty. IPG has since installed process condensers on MCM MACT subject equipment to comply with the emission limits of the MCM MACT. A compliance schedule is included in Appendix 2 of the ROP.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2018**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	10.15
Lead (Pb)	0.00003
Nitrogen Oxides (NO _x)	12.12
Particulate Matter (PM)	1.32
Sulfur Dioxide (SO ₂)	0.07
Volatile Organic Compounds (VOCs)	411.55

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2018 by IPG:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Toluene	348
Total Hazardous Air Pollutants (HAPs)	348

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

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is in St. Clair County. St. Clair County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard. A portion of St. Clair County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the SO₂ standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of volatile organic compounds exceeds 100 tons per year and the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, 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 major source with respect to Prevention of Significant Deterioration (PSD) because the potential to emit of volatile organic compounds (VOC) is greater than 250 tons per year. No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of The Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality or 40 CFR 52.21. EU-WETMIX&WHIP-OP, EU-COATINGLINE1, EU-COATINGLINE3, EU-COATINGLINE4, the largest sources of VOC emissions at the facility, were constructed/installed prior to June 19, 1978, the promulgation date of the PSD regulations. The New Source Review (NSR) permit for EU-PILOT-LINE was approved on June 14, 1978, prior to the promulgation date of the PSD regulations. At the time of NSR permitting for EU-WETMEIXEXTRUDER, the potential to emit VOC from the project was less than 40 tons per year, therefore the project was not subject to PSD review.

FG-COATINGPROCESS is subject to the VOC emission rate in Rule 610(2). Rule 610(2)(f) prohibits the emission of VOC from the coating of non-metallic surfaces of fabrics, vinyl, or paper, from an existing coating line, in excess of the applicable emission rates shown in column A of table 63 or the equivalent emission rates in column B of table 63. The applicable limit in column A of table 63 of Rule 610 for FG-COATINGPROCESS is 2.9 lbs. of VOC emitted per gallon of coating, minus water, as applied. There is no equivalent emission rate listed in column B of table 63. The Permit to Install (PTI) for the emission units in FG-COATINGPROCESS (PTI No. 104-80) includes an equivalent VOC emission limit of 4.79 lbs/gallon of coating solids applied, calculated using the formula in Rule 1040(12)(b)(i), and an equation for determining compliance with the 4.79 pounds per gallon coatings solids applied. Rules 1040(12)(b)(ii) through (vii) reference equations to be used to calculate the pounds of VOC per gallon of coating solids for coating lines with one or more add-on control device. The equation in PTI 104-80 for calculating the VOC pounds per coating solid applied in is equivalent to the equation in Rule 1040(12)(b)(vii), however, the equation in the PTI does not specify how to calculate the weight of VOC used during the averaging period, the volume of solids applied during the averaging period, nor the destruction efficiency of the control devices. Rules 1040(12)(b)(iii), (iv), and (vi) state the equations in Rule 1040(6), (7), (11) are to be used to calculate the weight of VOC used during the averaging period, volume of solids applied during the averaging period, and the destruction efficiency of the control devices, respectively. The equations in PTI 104-80 and Rule 1040(6), (7), (11), and (12) are included in Appendix 7 of the ROP.

Three tables were added to this ROP to address MACT HHHHH requirements – EU-PROCESSVESSELS, EU-EQUIPMENTLEAKS, and FG-MACT HHHHH.

PTI No. 81-14 was incorporated into this ROP as the table “EU-WETMIXEXTRUDER”. EU-WETMIXEXTRUDER was installed on June 6, 2016 to eventually replace the EU-COMPOUNDING process. Currently EU-COMPOUNDING is still used while the EU-WETMIXEXTRUDER process is being developed. Intertape provided a notification of startup for EU-WETMIXEXTRUDER which lists June 6, 2016 as the install date.

EU-GENERATOR 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 (NSPS JJJJ). EU-GENERATOR became subject to NSPS JJJJ when the engine was replaced with a new emergency engine in 2018. The previous generator was subject to the requirements of 40 CFR 63, Subpart ZZZZ (NESHAP ZZZZ). The new generator complies with NESHAP ZZZZ by complying with NSPS JJJJ.

EU-SRSBOILER is subject to 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

EU-WETMIX&WHIP-OP, EU-PILOT-LINE, EU-COATINGLINE1, EU-COATINGLINE 3, and EU-COATINGLINE 4 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Printing and Other Web Coating promulgated in 40 CFR Part 63, Subparts A and JJJJ.

EU-PROCESSVESSELS, EU-EQUIPMENTLEAKS, and parts of EU-WETMIX&WHIP-OP (Mix Tank #6, and Churn Tank #6, and the whip process – when used to produce coatings for off-site use) at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing promulgated in 40 CFR Part 63, Subparts A and HHHHH.

EU-PROCESSVESSELS is subject to 40 CFR Part 63, Subpart SS – National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process.

ACO No. 2020-14 requires performance testing to demonstrate the condenser used to control HAP emissions from the mix and churn tanks meets the minimum 75% HAP reduction limit in 40 CFR Part 63 Subpart HHHHH. 40 CFR 63.8005(d)(1) allows for this demonstration to be met through design evaluation. IPG submitted a design evaluation that shows the condenser for the mix and churn tanks will meet HAP reduction limits even under the worst-case scenario. AQD Warren District Supervisor, Ms. Joyce Zhu, and AQD Enforcement Division Environmental Quality Analyst, Ms. Erin Moran, agreed that the performance testing requirement in the ACO is met through design analysis.

EU-SRSBOILER is subject to 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This is a new boiler that commenced operation on April 29, 2019. The new boiler (EU-SRSBOILER) is classified as a new natural gas fueled boiler located at a major source of HAP. The requirements are included in FG-BOILERMACT.

The AQD’s Rules 287 and 290 were revised on December 20, 2016. FG-RULE287(2)(c) and FG-RULE290 are flexible group tables created for emission units subject to these rules. Emission units installed before December 20, 2016, can comply with the requirements of Rule 287 and Rule 290 in effect at the time of installation or modification as identified in the tables. However, emission units installed or modified on or after December 20, 2016, must comply with the requirements of the current rules as outlined in the tables.

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."

EU-COMPOUNDING and EU-WETMIXEXTRUDER do not have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the units do not have potential pre-control emissions over the major source thresholds. EU-COMPOUNDING is controlled by two fabric dust collectors and EU-WETMIXEXTRUDER is controlled by a separate fabric filter baghouse. The pre-controlled potential to emit from either one is about 53 tons per year estimated based on mass balance calculations. The intent of EU-WETMIXEXTRUDER is to eventually replace the EU-COMPOUNDING process and four existing mix vessels such that the adhesives are formulated in a single process; however, this transition is still ongoing and EU-WETMIXEXTRUDER is currently being used on a limited basis. The dry component grinding and blending operation is expected to be the same between EU-COMPOUNDING and EU-WETMIXEXTRUDER, therefore, IPG expects pre-control particulate emissions to be the same (53 tons per year).

The emission limitations or standards for organic HAPs at the stationary source with the underlying applicable requirement(s) of 40 CFR 63.8005(a), from EU-PROCESSVESSELS are exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(i) because the $\geq 75\%$ reduction by weight for Organic HAP with vapor pressure ≥ 0.6 kPa and $\geq 60\%$ reduction by weight for Organic HAP with vapor pressure < 0.6 kPa meet the CAM exemption for NSPS or MACT proposed after November 15, 1990.

The emission limitation or standard for Organic HAPs at the stationary source with the underlying applicable requirement(s) of 40 CFR 63.3320(b)(1) through (b)(4) from EU-COATINGLINE1, EU-COATINGLINE3, EU-COATINGLINE4, and EU-PILOT-LINE are exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(i) because “No more than 20% of the mass of coating solids applied; (or No more than 5% of the organic HAP applied (95% reduction); No more than 4% of the mass of coating materials applied; or Outlet organic HAP concentration no greater than 20 ppmv and capture system efficiency 100%) meets the CAM exemption for NSPS or MACT proposed after November 15, 1990.

The following Emission Units/Flexible Groups are subject to CAM:

Emission Unit/Flexible Group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM?*
EU-COATINGLINE1 EU-COATINGLINE3 EU-COATINGLINE4 EU-PILOT-LINE	VOC= 4.79 pounds per gallon of coating solids applied	R 336.1201(3) R 336.1610	Regenerative Thermal Oxidizer (RTO) Solvent Recovery System (SRS)	Static pressures for RTO and SRS capture efficiency ^a RTO combustion temperature destruction efficiency ^b Solvent used and recovered for SRS Recovery efficiency ^c	FG-COATINGPROCESS	YES
EU-PILOT-LINE	VOC= 32.87 pounds per hour	R 336.1201(3)	Regenerative Thermal Oxidizer	Static pressures for RTO	FG-COATINGPROCESS	YES

Emission Unit/Flexible Group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM?*
				capture efficiency ^a RTO combustion temperature destruction efficiency ^b		
EU-PILOT-LINE	VOC = 65.74 tons per year	R 336.1201(3)	Regenerative Thermal Oxidizer	Static pressures for RTO capture efficiency ^a RTO combustion temperature destruction efficiency ^b	FG-COATINGPROCESS	YES

* Presumptively Acceptable Monitoring (PAM)

^a RTO Capture Efficiency is verified by monitoring the static pressure at the exhaust fan inlet for each oven zone controlled by the RTO using pressure transmitters. The static pressure at these zones must be maintained above 75% of the average static pressure determined during the most recent capture efficiency performance test. This monitoring approach was chosen because static pressure at the oven exhaust zones is an indicator that the exhaust fans are functioning properly.

^b RTO Destruction Efficiency is verified by monitoring the RTO combustion chamber temperature using permanently installed thermocouples. The temperature in the RTO combustion chamber must be maintained above the average temperature determined during the most recent destruction efficiency test (1444°F). This monitoring approach was chosen because an RTO combustion chamber temperature above 1444°F indicates that the RTO is achieving the destruction efficiency established in the most recent stack test.

^c SRS Recovery Efficiency is verified by monitoring the amount of solvents (VOC) used on coating stations that are exhausted to the SRS and monitoring the amount of solvent recovered by the SRS on a rolling 30-day period. The SRS Recovery Efficiency must be maintained above 75.2% based on a 30-day rolling average. This monitoring approach was chosen because SRS Recovery Efficiency is a direct measure of the SRS performance.

FG-COATINGPROCESS consists of three primary adhesive tape manufacturing web coating lines and one pilot web coating line. The VOC emissions from the application hoods where solvent based adhesives are added and immediate oven/dryer zone of the three coating lines (EU-COATINGLINE1, EU-COATINGLINE3, EU-COATINGLINE4) are captured and directed to the SRS and other application hoods and dryer/oven exhausts are captured and directed to the RTO. The pilot line (EU-PILOT-LINE) emissions are captured and directed to the RTO. The RTO capture efficiency is verified by monitoring the static pressure of the exhaust fan inlet for each dryer/oven zone and the SRS capture efficiency is verified by monitoring the static pressure of the exhaust fan inlet for each application hood and dryer/oven zone. The RTO destruction efficiency is verified by monitoring the RTO combustion zone temperature. The SRS collection efficiency is verified by monitoring the solvent used daily and the solvent recovered daily calculated based on a 30-day rolling average. The static pressures and RTO combustion zone temperatures are verified and established during stack tests.

The Initial ROP (199700107a) was modified on August 15, 2006, to incorporate a request from the company to change to the POWC MACT HAP emission calculation method specified in Equation 14 (40 CFR 63.3370(n)(1)(ii) and (o)(3)) and Equation 15 (40 CFR 63.3370(n)(3)(iii)(B) and (o)4). Since the

POWC MACT specifically requires use of these equations, AQD could not make this change without the approval of the USEPA. The company obtained approval from USEPA to modify the HAP emission calculation method. Therefore, Appendix 10 was added to the ROP to incorporate the approved alternative method.

The monitoring procedures and performance indicators are established in the Paper and Other Web Coating MACT codified in 40 CFR 63, Subpart JJJJ. The primary VOC used at IPG is toluene which is also a HAP.

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. western are identified in Appendix 6 of the ROP.

PTI Number			
104-80 ^a	885-93	423-78	221-75 ^b
185-99 ^a			

^a There are three permits with the number 104-80 issued to IPG for coating lines. The 1989 version is the most recent version of PTI 104-80 and is included in the ROP.

^b The permit contains only general conditions which are now contained in Part A- General Conditions of this ROP.

^c All equipment permitted in PTI 185-99 was removed. The ROP/Source-wide PTI does not contain any conditions from PTI 185-99.

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(4) Citation	PTI Exemption Rule Citation
EUOBOILER	812,000 BTU/hr Office Boiler. Installed in 1954	R336.1212 (4)(b)	R336.1282(2)(b)(i)
EUBLDG41BOILER	125 HP (5.2 MMBTU/hr) Building 41 Boiler, Installed in 1954	R336.1212 (4)(b)	R336.1282(2)(b)(i)

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EURECUREOVEN	Recure oven in B Warehouse, natural gas fired, 0.41 MMBtu/hr	R336.1212 (4)(b)	R336.1282(2)(b)(i)
EUTOTES	Adhesive totes which store adhesive work in process	R336.1212 (4)(c)	R336.1284(2)(i)
EU-STORAGETANK1	20,000-gallon underground storage tank used to store fresh and reclaimed toluene (True vapor pressure less than 1.5 psia)	R336.1212 (4)(c)	R336.1284(2)(i)
EU-STORAGETANK2	20,000-gallon underground storage tank used to store fresh and reclaimed toluene (True vapor pressure less than 1.5 psia)	R336.1212 (4)(c)	R336.1284(2)(i)

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 at the time of issuance of the ROP except for requirements listed in Appendix 2. 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 requirement that the source is not in compliance with at the time of ROP issuance is supplemental to, and shall not sanction non-compliance with, the applicable requirements on which it is based.

Action taken by 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 Joyce Zhu, Warren District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

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AUGUST 12, 2021 - STAFF REPORT ADDENDUM

MI-ROP-A6220-2021

Purpose

A Staff Report dated July 2, 2021, 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:	Brian Newman, Operations Manager 810-941-6371
AQD Contact:	Adam Bognar, Environmental Engineer 586-854-1517

Summary of Pertinent Comments

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

Changes to the July 5, 2021 Draft ROP

No changes were made to the draft ROP.