

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
B3692

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-B3692-2015b

**Packaging Corporation of America - Filer City Mill**

SRN: B3692

Located at:

2246 Udell Street, Filer City, Manistee County, Michigan 49634

Permit Number: MI-ROP-B3692-2015b

Staff Report Date: February 9, 2015

Amended Dates: July 2, 2015; April 15, 2016

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) requires that the Michigan Department of Environmental Quality (MDEQ), 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 Environmental Quality  
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B3692

**RENEWABLE OPERATING PERMIT**

**FEBRUARY 9, 2015 - STAFF REPORT**

ROP Number

MI-ROP-B3692-2015

**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 of 1990 and Michigan's Administrative Rules for Air Pollution Control pursuant to 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:	Packaging Corporation of America - Filer City Mill 2246 Udell Street Filer City, Michigan 49634
Source Registration Number (SRN):	B3692
North American Industry Classification System (NAICS) Code:	322121
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201400011
Responsible Official:	Robert J. Peretin, Mill Manager 231-723-9951
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411
Date Application Received:	January 21, 2014
Date Application Was Administratively Complete:	January 27, 2014
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	February 9, 2015
Deadline for Public Comment:	March 11, 2015

**Source Description**

The PCA Filer City Mill is a semi-chemical mill that produces corrugated medium, which is used as the inner layer in corrugated cardboard. The plant produces the corrugated medium from whole logs, which are debarked and then processed into chips which pass through scalping screens and are transferred to storage piles or storage silos. Purchased chips are also used along with recycled cardboard. Particulate emissions from processing, conveying and transfer of the chips are controlled by cyclone dust collection systems. The chips are softened in digesters by cooking under high pressure using sodium carbonate solution (white liquor) and mechanical action is used to separate the wood fibers. The fibers are then washed, mixed with various additives in the stock chests and processed on the paper machines into corrugated medium. Non condensable gasses (NCGs) from the pulping process are collected by the Low Volume High Concentration (LVHC) system which routes the NCGs to the Mill's No. 1 and 2 boilers where they are thermally oxidized. The resulting solution after the fibers have been removed is referred to as black liquor. The black liquor is burned through a fluidized bed reactor (Copeland reactor) to produce sodium carbonate that is used again to produce white liquor in the process. Exhaust gasses from the Copeland reactor are controlled by cyclones, a venturi scrubber, and a Regenerative Thermal Oxidizer. A wet electrostatic precipitator (WESP) is located following the venturi scrubber and demister that control the PM emissions from the Copeland reactor. The WESP is located prior to the regenerative thermal oxidizer but only serves to protect the operation of this unit and not to demonstrate compliance with any emission limits. Polished whitewater from the paper machines, black liquor and other process waste streams can be digested in the biogas system by anaerobic microorganisms. A product of this biological digestion is the generation of methane-rich biogas that is scrubbed and then fired as fuel in Boiler No. 1, Boiler No. 2, and/or Boiler No. 4A. The No. 1 and No. 2 boilers also have the capability to be fired on coal, oil, or natural gas and are controlled by a shared baghouse when burning coal. The No. 4A boiler burns natural gas and biogas and is equipped with low NOx burners.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2013**.

**TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	888
Lead (Pb)	<1
Nitrogen Oxides (NO <sub>x</sub> )	618
Particulate Matter (PM)	53
Sulfur Dioxide (SO <sub>2</sub> )	1206
Volatile Organic Compounds (VOCs)	965
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>0</b>

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

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases in tons per year of CO<sub>2</sub>e is greater than 100,000 tons per year. PCA Filer City reported actual CO<sub>2</sub>e emissions of 237,251 tons to USEPA in 2012. CO<sub>2</sub>e is a calculation of the combined global warming potentials of six Greenhouse Gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

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 Manistee County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit all criteria pollutants 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 and the potential to emit of Greenhouse Gases is 100,000 tons per year or more calculated as carbon dioxide equivalents (CO<sub>2</sub>e) and 100 tons per year or more on a mass basis.

FGBIOGASSYSTEM at the stationary source was subject to an applicability determination under the Prevention of Significant Deterioration (PSD) regulations of 40 CFR Part 52.21 which indicated the proposed modification was not subject to further review under PSD (PTI 159-06 Evalform). Additionally, EUBOILER4A is a synthetic minor source under PSD because the permittee has accepted legally enforceable permit conditions limiting the potential to emit of NO<sub>x</sub> and CO to less than 250 tons per year.

At this time, there are no GHG applicable requirements to include in the ROP. The mandatory Greenhouse Gas Reporting Rule under 40 CFR Part 98 is not an ROP applicable requirement and is not included in the ROP.

EUPAPERMACH1, EUPAPERMACH2, and EUPAPERMACH3 were installed prior to August 15, 1967. As a result, this equipment is considered "grandfathered" and is not subject to New Source Review (NSR) permitting requirements. However, future modifications of this equipment may be subject to NSR. This equipment does not have any underlying applicable requirements but must be included in the ROP since it is neither an insignificant activity nor exempt from permitting under R 336.1201. (R 336.1201)

EUBOILER2 and EUBOILER4A at the stationary source are subject to the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units promulgated in Title 40 CFR Part 60, Subparts A and Db. EUBOILER1 is not subject to Subparts A and Db because it was constructed prior to June 19, 1984 and has not been reconstructed or modified since then.

EUDIGESTERS, EUEVAPLTV, and EUEVAPFC at the stationary source are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Pulp and Paper Industry promulgated in 40 CFR Part 63, Subparts A and S.

EUGENERAC is a 21.45 hp stationary spark ignition emergency generator used to power the biogas flare in case of an emergency. It is a new (constructed after June 12, 2006) stationary RICE subject to 40 CFR Subpart ZZZZ (RICE MACT) but, according to 63.6590(c)(4), meets the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. However, EUGENERAC is not subject to any requirements under 40 CFR Part 60, Subpart JJJJ per 60.4230(a) as it less than 25 hp and was constructed prior to July 1, 2008.

EUCOPELAND+DISTANK at the stationary source are subject to the National Emission Standards for Hazardous Air Pollutants or Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi chemical Pulp Mills promulgated in 40 CFR Part 63, Subparts A and MM.

EUBOILER1, EUBOILER2, EUBOILER4A, and EUWTPHEATER at the stationary source are subject to the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters in 40 CFR Part 63, Subparts A and DDDDD (Boiler MACT). The Boiler MACT has a future compliance date of January 31, 2016. Consistent with EPA's May 20, 1999, letter to Mr. Robert Hadanbosi and Mr. Charles Lagges of STAPPA/ALAPCO, when a permit is issued prior to the MACT compliance date, this ROP contains a description of MACT applicability at the Subpart level.

EUBOILER1 at the stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR Part 64. This emission unit has a control device (baghouse) and potential pre-control emissions of particulate matter greater than the major source threshold level. The CAM monitoring selected for the control device is the existing COMS which was chosen because opacity can be used as a surrogate for PM emissions with appropriate ranges established during PM emissions testing. Additionally, the COMS provides a continuous means of monitoring the process emissions.

EUBOILER2 at the stationary source is subject to the federal CAM rule under 40 CFR Part 64. This emission unit has a control device (baghouse) and potential pre-control emissions of particulate matter greater than the major source threshold level. The CAM monitoring selected for the control device is the existing COMS which was chosen because opacity can be used as a surrogate for PM emissions with appropriate ranges established during PM emissions testing. Additionally, the COMS provides a continuous means of monitoring the process emissions.

EUFLYASH at the stationary source is subject to the federal CAM rule under 40 CFR Part 64. This emission unit has a control device (baghouse) and potential pre-control emissions of particulate matter greater than the major source threshold level. The CAM monitoring selected for the control device is the existing baghouse differential pressure monitor which was chosen to indicate proper operation of the baghouse and to detect changes in performance and mechanical failures.

EUSODA-ASH at the stationary source is subject to the federal CAM rule under 40 CFR Part 64. This emission unit has a control device and potential pre-control emissions of particulate matter greater than the major source threshold level. The CAM monitoring selected for the control device is the existing baghouse differential pressure monitor which was chosen to indicate proper operation of the baghouse and to detect changes in performance and mechanical failures

EUCOPELAND+DISTANK at the stationary source are subject to the federal CAM rule under 40 CFR Part 64. This emission unit has a control device and potential pre-control emissions of particulate matter greater than the major source threshold level. The CAM monitoring selected for the control device is the existing venture scrubber differential pressure monitor which was chosen to indicate proper operation of the scrubber and to detect changes in performance and mechanical failures

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the DEQ "*Procedure for Evaluating Periodic Monitoring Submittals.*"

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-B3692-2009 are identified in Appendix 6 of the ROP.

PTI Number			
159-06B	19-03	145-02	681-80B
891-79	632-78	229-71	

**Streamlined/Subsumed Requirements**

The following table lists explanations of any streamlined/subsumed requirements included in the ROP pursuant to Rules 213(2) and 213(6). All subsumed requirements are enforceable under the streamlined requirement that subsumes them.

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
EUBOILER4A	I.1	0.17 pound of NOx per MMBtu based on a 30 day rolling average (R 336.1205(3)).	0.20 pound of NOx per MMBtu (40 CFR 60.44b(a)).	The nitrogen oxides emission limit determined through NSR review and listed in condition I.1. (0.17 pound NOx per MMBtu based on a 30 day rolling average) is more stringent than the 0.20 pound per MMBtu nitrogen oxides limit in NSPS Subpart Db.

**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.

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EUWTPHEATER (Propane boiler for secondary treatment plant)	1.26 MMBtu Columbia WL-90 propane fired steam boiler.	R 336.1212(4)(b)	R 336.1282(b)
EUGENERAC (Biogas Flare-Generac)	54,643 BTU/Hr, 16Kw propane fired Generac emergency generator.	R 336.1212(4)(d)	336.1285(g)
EUPROPANETKS (Propane Storage Tanks)	5 propane storage vessels each less than 1,000 gallons.	R 336.1212(4)(c)	R 336.1284(b)

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EUGASOLINETK	1,000 gallon gasoline storage vessel located at a gasoline dispensing facility dispensing less than 20,000 gallons of gasoline per day.	R 336.1212(4)(c)	R 336.1284(g)(i)
EUDIESELTKS	6 diesel storage vessels with capacity of less than 8,000 gallons each. Vessels are stored as specified in ASTM-D-975.	R 336.1212(4)(c)	R 336.1284(i)
EU284PULPTANKS	27 pulp tanks, for storage or transfer operations, that have a capacity of less than 40,000 gallons each. Pulp is a noncarcinogenic liquid with a true vapor pressure under 1.5 psia at actual storage conditions.	R 336.1212(4)(c)	R 336.1284(i)
EU284WHITEWATER	24 process water (whitewater) storage vessels that have a capacity of less than 40,000 gallons each. Whitewater is a noncarcinogenic liquid with a true vapor pressure under 1.5 psia at actual conditions.	R 336.1212(4)(c)	R 336.1284(i)
EU284PROCESSCHEM	10 process chemical storage vessels that have a capacity of less than 40,000 gallons each. The process chemicals stored in these vessels are noncarcinogenic liquids with a true vapor pressure under 1.5 psia at actual conditions.	R 336.1212(4)(c)	R 336.1284(i)
EUCHEMICALS	Approximately 80 tanks or totes of purchased chemicals that have a capacity of less than 40,000 gallons each. The purchased chemicals stored in these vessels are noncarcinogenic liquids with a true vapor pressure under 1.5 psia at actual conditions and no known	R 336.1212(4)(c)	R 336.1284(i)
EUPORTABLEICE	Approximately five (5) portable gasoline-fired electric generators for miscellaneous uses around the mill used irregularly on an as-needed basis. All engines have a rated power output of less than 10,000,000 BTU/hour output (3,929 HP). (Actual capacity of largest generator = 61,066 BTU/Hr (24 HP).	R 336.1212(4)(d)	R 336.1285(g)

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

The following table lists terms and/or conditions of the draft ROP that the AQD and the applicant did not agree upon and outlines the applicant's objections pursuant to Rule 214(2). The terms and conditions that the AQD believes are necessary to comply with the requirements of Rule 213 shall be incorporated into the ROP.

<b>Emission Unit/ Flexible Group ID</b>	<b>Permit Term(s) and/or Condition(s) in Dispute</b>	<b>Applicant's Objection</b>
EUCOPELAND+DIS TANK	SC I.2 and SC V.2	The applicant requested the removal of the TRS emission limit and testing requirement as they are no longer applicable to the processes currently in place at the facility.
EUCOPELAND+DIS TANK	SC V.1	The applicant requested changing the annual PM testing requirement to once per permit cycle.

### **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 MDEQ, AQD**

The AQD proposes to approve this permit. 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 U.S. 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 Janis Ransom, Cadillac District Supervisor. The final determination for ROP 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 terms and conditions, and resolution of any objections by the USEPA.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

**RENEWABLE OPERATING PERMIT**

ROP Number

B3692

**MARCH 12, 2015 - STAFF REPORT ADDENDUM**

MI-ROP-B3692-2015

**Purpose**

A Staff Report dated February 9, 2015, 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 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:	Robert J. Peretin, Mill Manager 231-723-9951
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411

**Summary of Pertinent Comments**

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

**Changes to the February 9, 2015 Draft ROP**

No changes were made to the draft ROP.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

**RENEWABLE OPERATING PERMIT**

ROP Number

B3692

**JULY 2, 2015 - STAFF REPORT FOR RULE 216(2)  
MINOR MODIFICATION**

MI-ROP-B3692-2015a

**Purpose**

On April 27, 2015, the Department of Environmental Quality, AQD, approved and issued ROP No. MI-ROP-B3692-2015 to Packaging Corporation of America – Filer City Mill 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:	Robert J. Peretin, Mill Manager
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 517-582-5913
Application Number:	201500090
Date Application For Minor Modification Was Submitted:	June 18, 2015

**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**

Incorporate Permit to Install (PTI) No. 93-15. PTI No. 93-15 is an adjustment of the PM testing frequency to once every five years concurrent with the ROP cycle. The PTI also removes the TRS limit.

**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 MDEQ**

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B3692-2015, 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 USEPA has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District 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.

Michigan Department of Environmental Quality  
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**RENEWABLE OPERATING PERMIT**

ROP Number

B3692

**AUGUST 24, 2015 - STAFF REPORT ADDENDUM  
FOR RULE 216(2) MINOR MODIFICATION**

MI-ROP-B3692-2015a

**Purpose**

A Staff Report dated July 2, 2015, 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:	Robert J. Peretin, Mill Manager
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 517-582-5913

**Summary of Pertinent Comments**

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

**Changes to the July 2, 2015 Proposed ROP Minor Modification**

No changes were made to the proposed ROP Minor Modification.

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

**RENEWABLE OPERATING PERMIT**

ROP Number

B3692

**APRIL 15, 2016 - STAFF REPORT FOR  
RULE 216(2) MINOR MODIFICATION**

MI-ROP-B3692-2015b

**Purpose**

On August 24, 2015, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B3692-2015a to Packaging Corporation of America - Filer City Mill 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:	Robert J. Peretin, Mill Manager 231-723-9951
AQD Contact:	Caryn E. Owens, Environmental Quality Analyst 231-876-4414
Application Number:	201600048
Date Application For Minor Modification Was Submitted:	February 2, 2016

**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**

Incorporate Permit to Install (PTI) No. 210-15. PTI No. 210-15 removes the scrubber requirement for biogas sent to the boilers from FGBIOGASSYSTEM and updates the H2S and SO2 emission limits.

Additionally, this modification incorporates language to allow for the option of a predictive emissions monitoring system (PEMS) for air pollution control monitoring in EUBOILER2 and EUBOILER4A when burning natural gas or biogas.

**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 MDEQ**

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B3692-2015a, 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 USEPA has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District 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.

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B3692

**JUNE 1, 2016 - STAFF REPORT ADDENDUM FOR  
RULE 216(2) MINOR MODIFICATION**

MI-ROP-B3692-2015b

**Purpose**

A Staff Report dated April 15, 2016, 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:	Robert J. Peretin, Mill Manager 231-723-9951
AQD Contact:	Caryn E. Owens, Environmental Quality Analyst 231-876-4414

**Summary of Pertinent Comments**

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

**Changes to the April 15, 2016 Proposed ROP Minor Modification**

No changes were made to the proposed ROP Minor Modification.