

State Registration Number

B6237

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

MI-ROP-B6237-2020

Ypsilanti Community Utilities Authority

State Registration Number (SRN): B6237

Located at

2777 State Street, Ypsilanti, Washtenaw County, Michigan 48197

Permit Number: MI-ROP-B6237-2020

Staff Report Date: May 25, 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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State Registration Number

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RENEWABLE OPERATING PERMIT

May 25, 2020 - 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: | Ypsilanti Community Utilities Authority 2777 State Street Ypsilanti, Michigan 48197 |
| Source Registration Number (SRN): | B6237 |
| North American Industry Classification System (NAICS) Code: | 562213 |
| Number of Stationary Source Sections: | 1 |
| Is Application for a Renewal or Initial Issuance? | Renewal |
| Application Number: | 201900138 |
| Responsible Official: | Mr. Jeff Castro, Director 734-484-4600 |
| AQD Contact: | Diane Kavanaugh Vetort, Senior Environmental Quality Analyst 517-416-3735 |
| Date Application Received: | August 13, 2019 |
| Date Application Was Administratively Complete: | August 13, 2019 |
| Is Application Shield in Effect? | Yes |
| Date Public Comment Begins: | May 25, 2020 |
| Deadline for Public Comment: | June 24, 2020 |

Source Description

The Ypsilanti Community Utilities Authority (YCUA) is a municipal wastewater treatment plant (WWTP) located in Ypsilanti, Washtenaw County, Michigan. The WWTP serves the City of Ypsilanti and Washtenaw County Townships of Ypsilanti, Pittsfield, Superior, Sumpter, and Augusta, and the Western Wayne County Township Utility Authority. YCUA operates a fluidized bed sewage sludge incinerator (FBSSI) and air pollution control system that includes a venturi /multistage impingement tray scrubber, a wet electronic precipitator (WESP), and a granular activated carbon adsorber (GAC) bed. The WWTP also includes an odor control building with a chemical scrubber for other WWTP process areas. Ancillary equipment at the facility includes two natural gas-fired boilers, seven emergency generators (2 stationary and 5 portable) and one aboveground gasoline storage tank.

The general description of the process equipment and emission sources is as follows. The incoming wastewater treatment plant sludge enters the reactor vessel of the FBSSI and mixes with the hot fluidized sand in the bed area of the reactor. The hot sand is heated by the high temperature air of the primary heat exchanger and auxiliary fuel combustion and incinerates the sludge and produces an inert ash. The flue gases containing the ash exit the top of the fluidized bed reactor and pass through heat exchangers. The gases then pass through the Venturi-scrubber where particulate is removed by water injection and gas velocity increases. Then, subcooling takes place in the Impingement Tray-scrubber to remove condensable gas byproducts. Collected ash slurry is disposed of properly. The gases then pass through the WESP to remove very fine particulate matter. Again, collected ash is disposed of properly. The final air pollution control device is the GAC, which contains a conditioner (chevron separator & heat exchanger) to remove water droplets and heat the offgas, and a carbon adsorber, which is used to capture trace pollutants in the gas stream. A continuous emission monitoring system (CEMS) was existing but as of 2017 has undergone initial performance specification testing and annual relative accuracy test audits and is being used for compliance with the CO and SO₂ emission limits.

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) | 1 |
| Lead (Pb) | <1 |
| Nitrogen Oxides (NO _x) | 1 |
| Particulate Matter (PM) | <1 |
| Sulfur Dioxide (SO ₂) | 1 |
| Volatile Organic Compounds (VOCs) | <1 |

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

| Individual Hazardous Air Pollutants (HAPs) ** | Pounds per Year |
|--|------------------------|
| Arsenic | 0.12 |
| Beryllium | 0.03 |
| Cadmium | 0.02 |
| Chromium | 0.66 |
| Mercury | 0.86 |
| Total Hazardous Air Pollutants (HAPs) | 1.69 |

**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.

Washtenaw 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.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the source is subject to Standards of Performance for New Stationary Sources for Sewage Treatment Plants promulgated in 40 CFR Part 60, Subpart MMMM. Act 451, as amended, Natural Resources and Environmental Protection Act, Part 55, Air Pollution Control and the administrative rules specifically, R 336.1211(1)(c) (Rule 211) provide the State's authority to require an ROP for the existing sewage sludge incinerator as a source regulated by Part 129 of the Clean Air Act Amendments.

The stationary source is a minor source of HAP emissions because the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of criteria pollutants was less than 250 tons per year.

NSPS

EU-FBSSI at the stationary source is subject to the Standards of Performance for Sewage Treatment Plants promulgated in 40 CFR Part 60, Subparts A and O.

EU-FBSSI at the stationary source is subject to the Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Sewage Sludge Incineration Units, promulgated in 40 CFR Part 60, Subparts A and MMMM. YCUA is an existing source subject to Subpart MMMM.

FG-BOILERS at the stationary source is subject to the Standards of Performance for Commercial, Industrial Boilers promulgated in 40 CFR Part 60, Subparts A and Dc. The boilers meet the definition of an affected source but have no applicable requirements because they only combust natural gas.

NESHAP / MACT

EU-FBSSI at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Beryllium promulgated in 40 CFR Part 61, Subparts A and C.

EU-FBSSI at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Mercury promulgated in 40 CFR Part 61, Subparts A and E.

EU-GASTANK#1 at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Gasoline Dispensing Facilities promulgated in 40 CFR Part 63, Subparts A and CCCCC (Area Source MACT). The ROP contains special conditions provided by YCUA in their application for applicable requirements from 40 CFR Part 63, Subparts A and CCCCC. The AQD is not delegated the regulatory authority for this area source MACT.

FG-ENGINES at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Compression Ignition Stationary Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (Area Source MACT). The ROP contains special conditions provided by YCUA in their application for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ. The AQD is not delegated the regulatory authority for this area source MACT.

YCUA organized their emission units (EU) into the following EU and flexible groupings (FG): EU-FBSSI, EU-GASTANK#1, FG-BOILERS, FG-ENGINES, and FG-COLDCLEANERS.

EU-FBSSI contains the permit requirements for the Fluidized Bed Sewage Sludge Incinerator controlled with a venturi scrubber, a multi-stage impingement tray scrubber, a wet electrostatic precipitator, and a granular activated carbon adsorber bed. EU-FBSSI requires emission limits, associated monitoring, record keeping, and performance testing.

In the ROP, EU-FBSSI is subject to R 3336.1201(3) (Rule 201), R 336.1224 (Rule 224), R 336.1225 (Rule 225), R 336.1702 (a) (Rule 702), R 336.1901 (Rule 901), R 336.1910 (Rule 910), R 336.1911 (Rule 911), R 336.1912 (Rule 912) and the federal 40 CFR Part 60, Subpart O (NSPS EG for Sewage Sludge Incinerators), 40 CFR Part 61, Subpart C (Beryllium NESHAP), and 40 CFR Part 61, Subpart E (Mercury NESHAP), and the exhaust stack applicable requirements are Rule 225 and 40 CFR 52.21 (c) and (d). To comply, EU-FBSSI will maintain emission limits of CO, PM, Arsenic, Beryllium, Cadmium, Total Chromium, Mercury, 2,3,7,8 TCDD TEQ (2,3,7,8-Tetrachlorodibenzodioxin), Total PCB (Polychlorinated biphenyl), and HCl (Hydrogen Chloride) and sewage sludge metal content limits, and material usage limits. Performance testing is required to demonstrate compliance with the emission limits. The initial testing for visible emissions, particulate, CO, beryllium, mercury, arsenic, cadmium, total chromium, 2,3,7,8 TCDD TEQ, Total PCB and HCl was completed and compliance demonstrated. Additional testing is required in accordance with the Federal and State standards referenced as part of the current ROP. YCUA is required to operate, monitor, and maintain the associated air pollution control equipment (APC) in accordance with Rule 910, Rule 911 and Rule 912. The ROP requires a Malfunction Abatement Plan that includes safe operating and shutdown procedures for the EU-FBSSI and APC. The plan has been submitted, approved and implemented. Continuous monitoring devices are required to be installed and operated properly. Records are required to be kept as specified in the applicable federal standards, and for the emissions, usage, and monitoring requirements.

EU-GASTANK#1 contains a 3,000-gallon aboveground gasoline storage tank for fueling of vehicles. This new tank was installed in October 2019 and replaces the previous 2,000-gallon tank EU-GASTANK. The Tank is equipped with submerged fill. This Table in the ROP contains conditions for the new applicable requirement pursuant to the federal 40 CFR Part 63, Subpart CCCCCC.

FG-BOILERS contains the two natural gas fired boilers EU-BOILER1 and EU-BOILER2, each with rated heat input capacity of 21 million BTU/hour. The ROP contains requirements to burn pipeline natural gas only and to keep usage records.

FG-ENGINES contains two existing, emergency, diesel-fired compression ignition reciprocating internal combustion engine generators subject to the 40 CFR Part 63, Subpart ZZZZ (Area Source RICE MACT). EU-GENSOLIDS located in the Solids Building is a 1006 HP (750 kW) emergency generator, and EU-GENUV located in the UV Building is a 591 HP (400 kW) emergency generator. This Table in the ROP contains conditions for the new stated applicable requirement.

FG-COLDCLEANERS: Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. YCUA's ROP application included one maintenance cold cleaner on site.

Significant Changes Since the Prior ROP

EU-4M-NSPS-INCIN: This Table has been added to the ROP and it contains the underlying applicable requirements (UAR) for the Fluidized Bed Sewage Sludge (Biosolids) Incinerator (EU-FBSSI) subject to 40 CFR Part 60, Subpart M (4M). The conditions for this emission unit took effect on and after the effective date of Subpart M: March 21, 2016.

Since the prior ROP issuance, YCUA began use of an existing Continuous Emissions Monitoring System (CEMS) for compliance with Carbon Monoxide, and Sulfur Dioxide emission limits for EU-FBSSI. It appears the CEMS was installed due to the facility being subject to 40 CFR 503, Standards for the Use or Disposal of Sewage Sludge, Subpart E, Incineration. This UAR is not included in the permit due to EPA's suggestion that this subpart is not a part of the Clean Air Act (CAA). In 2016, YCUA submitted a plan for the existing CEMS to be tested and certified to allow them to use this as a compliance option under the CAA, federal NSPS Subpart M. The CEMS has and will continue to undergo an annual Relative Accuracy Testing Audits (RATA).

EU-FBSSI: During Technical Review several changes were made to underlying applicable requirements (UAR) in EU-FBSSI: several references to Rule 201(3) in EU-FBSSI were changed to other appropriate UAR however for special condition (SC) I.1 for Carbon Monoxide, Rule 201(3) is the appropriate citation because while the NAAQS review was conducted YCUA is a minor source under PSD. In addition, SC I.14 for Beryllium and SC I.17 for Mercury, Rule 201(3) is the appropriate citation because these pollutants were subject to a NESHAP. Permit Section review procedure at that time was followed. Permit Section review statement, *"From the permit evaluation document, it appears that beryllium and mercury sewage sludge concentration limits were evaluated as part of an impact review even though those pollutants were exempt from a toxics analysis because of the Part 61 NESHAPs. Since R225 was not applicable at the time of permitting, it would not be appropriate to switch the UAR to R225."*

Test Protocol language in EU-FBSSI emission limit table was changed to "hourly" with a note that this is the minimum required time period for testing. Also, SC I.14, 15, 16 and 17 are not actually emission limits but sewage sludge metal concentration limits and therefore were moved to Section II. Material Limits. AQD also added State Rule, R 336.1972, Emission standards for existing sewage sludge incineration units, as an additional UAR to the applicable 4M conditions. Rule 972 is the Michigan Administrative rule by which the requirements of the sewage sludge incineration NSPS' (Subparts LLLL and M) were codified as state requirements.

In the renewal application YCUA requested to remove two emission units: EU-BIOFILTER and EU-CHEMSCRUBBER. The biofilter was never installed. The scrubber is the odor control located on miscellaneous WWTP processes and qualifies for permit exemption. Neither EU had associated emission limits. AQD agreed with these changes and they have been removed from the current ROP.

Permit History

On December 13, 1977, the AQD issued Permit to Install (PTI) No. 575-77 for the Multiple-hearth Sewage Sludge Incinerator System. On September 2, 1999, the AQD issued a supplemental revision to the PTI 575-77 for an administrative change to correct the stack height within the permit. Modeling was not conducted at the time of original permit issuance.

On December 11, 1987, the AQD issued PTI No. 764-87 and 765-87 for modifications to two 12 MMBTU/hour natural gas fired boilers to add the ability to utilize #2 fuel oil.

On May 3, 1999, the AQD issued PTI No. 44-99 for an odor control system on the WWTP headworks including the influent structure, grit building, grit tanks, retention basin and the primary splitter flumes. The system included a two stage scrubber system with capacity of 26,100 cubic feet per minute.

On March 27, 2001, the AQD issued ROP No. 199600291 after YCUA became subject to the Title V program due to their emissions of CO having exceeded the major source threshold of 100 tons per year (tpy).

On September 11, 2003, the AQD issued PTI No. 68-02 for an expansion project featuring a new fluidized bed sludge incinerator (replacing the existing multiple hearth incinerator). The system was permitted at 16,380 dry tons per year of dewatered residual WWT biosolids (sewage sludge) with expected actual throughput of 8000 dry tons per year. The project increased the design flow rate of the WWTP to 46.0 million gallons per day. Advanced air pollution control was proposed consisting of a venturi scrubber, impingement tray scrubber, wet electrostatic precipitator, and an activated carbon adsorber. YCUA became a true minor source of emissions with the installation of the new incinerator. Therefore ROP No. 199600291 was subsequently voided on February 11, 2005.

The various control stages were proposed to collect particulate (large to submicron), heavy metals and acid gases. The later control stages were to remove trace residual organic compounds and mercury from the flue exhaust. Dioxin emissions were expected to be reduced by up to 95% and mercury emissions were expected to be reduced by up to 75% compared to the previous incinerator. Collected ash was to be disposed of in a licensed landfill.

The WWTP was expanded to handle additional wastewater flow. A biofilter system was proposed to run continuously to treat odors from the existing primary clarifiers (#1-6), thickener building, the new primary sludge storage tanks, waste activated sludge / thickened waste activated sludge storage tanks, and the solids processing building. One to three natural gas-fired package boilers were proposed for building heat and were not to exceed 50 MMBTU/hr. heat input in total (two 21 MMBTU/hr. boilers were installed replacing the existing two boilers). Other fuel usage was designated for diesel and gasoline for filling of fleet vehicles.

On November 28, 2005, the AQD issued PTI No. 68-02 a supplemental revision (no letter added) to EU-FBSSI permit special conditions to clarify where the temperature requirement of 1500 degrees Fahrenheit was to be measured and where the oxygen content was to be measured.

On November 21, 2007, the AQD issued PTI No. 68-02A to update the permit to reflect actual operating conditions. The YCUA incinerator had been operating for one year and had conducted performance testing. Based on this information there were certain conditions that needed to be modified to reflect the actual operating conditions. Testing showed the proposed change to monitoring parameters would maintain compliance with existing permit limits. Changes were made to special condition (SC) 1.8, SC 1.9, SC 1.10, SC 1.16, SC 1.17, SC 1.28 and 1.43.

On November 12, 2014, the AQD issued PTI No. 68-02B, to revise condition (then Special Condition 1.5) language describing the maximum hourly sludge feed rate and references to throughput language in the remaining testing conditions. YCUA requested that the maximum hourly sludge feed rate (Material Limit) permit condition be clarified to specifically address the design capacity of the sewage sludge incinerator and varying magnitude of the higher heating value present in sewage sludge. The limit was revised to "6,300 pounds of dry sewage sludge per hour." Furthermore, various pollutants are subject to annual or five years testing in the PTI No. 68-02B. The Test Conditions V.1, V.2 and V.3, were revised to reference that the testing must be performed at "maximum routine operating feed rate" to be consistent with 40 CFR 60.89(c). Finally, YCUA's July 2006 performance test confirmed the particulate matter (PM) rate was 0.047 lb/ton and is less than 0.75 lb/ton. They requested the removal of the conditions related to the compliant testing because they are no longer applicable. SC VI.7, VI.10 and VI.16 (h and i) were removed however a specific condition requiring YCUA to keep the record of the compliant test was included.

During the above technical review, on July 17, 2014, YCUA submitted a Rule 201 permit exemption analysis demonstrating that the addition of a Sodium Hydroxide (NaOH) injection pump to the Venturi Scrubber for enhanced control of Sulfur dioxide (SO₂) in order to maintain consistent compliance with the NSPS Subpart M, and for enhanced control of acid compounds in the GAC, qualifies for the permit exemption pursuant to Rule 285(d). The AQD Jackson District concurred with the exemption analysis in writing on July 22, 2014.

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

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."

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-B6237-2015 are identified in Appendix 6 of the ROP.

| PTI Number | | | |
|------------|--------|--------|--|
| 68-02 | 68-02A | 68-02B | |

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 |
|-----------------------------|--|----------------------|-----------------------------|
| EU-HEATERS | Natural gas fired water and space heaters less than 50 MMBTU/hr. | Rule 212(4)(b) | Rule 282(2)(b)(i) |
| EU-PORTABLE1 | Portable emergency generator, diesel fuel 175 kW (235 HP) | Rule 212(4)(d) | Rule 285(2)(g) |

| PTI Exempt Emission Unit ID | Description of PTI Exempt Emission Unit | Rule 212(4) Citation | PTI Exemption Rule Citation |
|------------------------------------|--|-----------------------------|------------------------------------|
| EU-PORTABLE2 | Portable emergency generator, diesel fuel 175 kW (235 HP) | Rule 212(4)(d) | Rule 285(2)(g) |
| EU-PORTABLE3 | Portable emergency generator, diesel fuel 175 kW (235 HP) | Rule 212(4)(d) | Rule 285(2)(g) |
| EU-FIREPUMP1 | Portable fire pump emergency generator, diesel 26.8 kW (36 HP) | Rule 212(4)(d) | Rule 285(2)(g) |
| EU-FIREPUMP2 | Portable fire pump emergency generator, diesel 60 kW (80 HP) | Rule 212(4)(d) | Rule 285(2)(g) |

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 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 Scott Miller, Jackson 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
B6237

RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-B6237-
2020

June 26, 2020 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated May 25, 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

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|-----------------------|---|
| Responsible Official: | Mr. Jeff Castro, Director 734-484-4600 |
| AQD Contact: | Diane Kavanaugh Vetort, Senior Environmental Quality Analyst 517-416-3735 |

Summary of Pertinent Comments

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

Changes to the May 25, 2020 Draft ROP

No changes were made to the draft ROP.