

State Registration Number  
B8570

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-B8570-2023a

**The Andersons Marathon Holdings, LLC**

State Registration Number (SRN): B8570

Located at

26250 B Drive North, Sheridan Township, Calhoun County, Michigan 49224

Permit Number: MI-ROP-B8570-2023a

Staff Report Date: March 20, 2023

Amended Date: October 31, 2023

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).

## TABLE OF CONTENTS

<b>March 20, 2023 - STAFF REPORT</b>	<b>3</b>
<b>April 26, 2023 - STAFF REPORT ADDENDUM</b>	<b>12</b>
<b>October 31, 2023 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION</b>	<b>13</b>

State Registration Number

B8570

**RENEWABLE OPERATING PERMIT**

**March 20, 2023 - STAFF REPORT**

ROP Number

MI-ROP-B8570-2023

**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:	The Andersons Marathon Holdings, LLC 26250 B Drive North Sheridan Township, Michigan 49224
Source Registration Number (SRN):	B8570
North American Industry Classification System (NAICS) Code:	493130
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900159
Responsible Official:	Harley Darnell, Plant Manager 517-629-9428
AQD Contact:	Amanda Cross, Senior Environmental Quality Analyst 269-910-2109
Date Application Received:	September 9, 2019
Date Application Was Administratively Complete:	September 9, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	March 13, 2023
Deadline for Public Comment:	April 12, 2023

## Source Description

The Andersons Marathon Holdings, LLC is a grain receiving, storage, and processing facility, producing ethanol and grain byproduct which is shipped off site for sale.

The main ethanol producing processes at the Facility are grain receiving and handling, grain milling, liquification, fermentation, distillation, dehydration, denaturing, and ethanol storage and loadout. The solids (dried distillers grain with solubles or DDGS) are separated from the ethanol after fermentation. These are dried, stored, and loaded out as agricultural feed product.

The initial ethanol plant commenced operations in August 2006. An expansion to the existing ethanol plant along with a combined heat and power (CHP) facility commenced operations in February 2017.

The particulate matter generated by the dry corn handling and processing and the DDGS handling and shipping are controlled by fabric filter baghouses. The VOC and air toxics emissions from the ethanol recovery and purification process, the solids drying process, and the liquification process are controlled by thermal oxidizers. The fermentation operation is controlled by wet scrubbers. The VOC and denaturant emissions from the final product loadout are controlled by a flare. A portion of the CO generated in the fermentation process is sent to a facility located adjacent to the plant.

The facility is located in a mainly rural area with corn fields on all sides.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2021**.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	33.18
Nitrogen Oxides (NO <sub>x</sub> )	126.89
Particulate Matter (PM)	62.92
Sulfur Dioxide (SO <sub>2</sub> )	17.3
Volatile Organic Compounds (VOCs)	116.02

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2021 by the Facility:

<b>Individual Hazardous Air Pollutants (HAPs) **</b>	<b>Tons per Year</b>
Acetaldehyde	4.21
Acrolein	2.26
Formaldehyde	0.85
Hexane	2.72
Methanol	1.04
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>11.08</b>

\*\*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 Calhoun County, which is currently designated by the United States 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 of particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) exceeds 100 tons per year.

The stationary source is a “synthetic minor” source regarding HAP emissions because the stationary source accepted a legally enforceable permit condition limiting the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, to less than 10 tons per year and the potential to emit of all HAPs combined to less than 25 tons per year.

The facility is considered a “nested source” for PSD applicability. The fossil fuel-fired steam electric plant with a capacity greater than 250 MMBTU/hr is subject to PSD with a potential to emit greater than 100 tons per year. The fossil fuel-fired steam electric plant is completely contained within a non-listed stationary source with PSD subjectivity of greater than 250 tons per year. Neither portion of the facility is subject to PSD.

The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations of 40 CFR 52.21 because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of carbon monoxide and nitrogen oxides to less than 100 tons per year, for the fossil fuel-fired steam electric plant. The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations of 40 CFR 52.21 because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of nitrogen oxides, volatile organic compounds, carbon monoxide, particulate matter, particulate matter less than 10 microns, particulate matter less than 2.5 microns, and sulfur dioxide to less than 250 tons per year, for the non-listed stationary source.

SOURCE-WIDE, the stationary source is subject to the Standards of Performance for Grain Elevators, promulgated in 40 CFR Part 60, Subparts A and DD.

EU-TO&WHRB within FGOXID and EU-Db within FGCHP at the stationary source are subject to the Standards of Performance for Industrial, Commercial, Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Db.

FGNSPSTANKS at the stationary source are subject to the Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Constructions, Reconstruction, or Modification Commenced After July 23, 1984 promulgated under 40 CFR Part 60, Subpart A and Kb.

EU-190PROOFCOND, EU-200PROOFCOND, EU-BEERCOLUMN, EU-BEERWELL, EU-CENTRIFUGE1, EU-CENTRIFUGE2, EU-CENTRIFUGE3, EU-CENTRIFUGE4, EU-FERMENTER1, EU-FERMENTER2, EU-FERMENTER3, EU-FERMENTER6, EU-FERMENTER7, EU-RECTIFIER, EU-SIDESTRIPPER, EU-YEASTTANK, EU-YEASTTANK2 at the stationary source are subject to the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006 promulgated under 40 CFR Part 60, Subpart A and VV.

EU-190PROOFCOND2, EU-BEERCOLUMN2, EU-CENTRIFUGE, EU-CENTRIFUGE6, EU-CENTRIFUGE7, EU-CENTRIFUGE8, EU-FERMENTER4, EU-FERMENTER5, EU-FERMENTER8, EU-FERMENTER9, EU-FERMENTER10, EU-RECTIFIER2, EU-SIDESTRIPPER2 at the stationary source are subject to the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic

Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 promulgated under 40 CFR Part 60, Subpart A and VVa.

EU-DIESELPUMP and EU-DIESELPUMP2 at the stationary source are subject to the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines promulgated under 40 CFR Part 60, Subpart A and IIII. These were established during NSR and are included in Permits to Install (PTI). Since the NSPS has been updated since the PTIs were issued, FGFIREPUMPS was included to include the newest requirements contained in 40 CFR Part 60, Subpart IIII. The more stringent requirements supersede those that are less stringent or out of date.

FGCHP at the stationary source is subject to the Standards of Performance for Stationary Combustion Turbines promulgated under 40 CFR Part 60, Subpart A and KKKK.

EU-DIESELPUMP and EU-DIESELPUMP2 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

The facility received a violation notice (VN) on November 10, 2022, stemming from a scheduled testing event on November 3, 2022. The VN was issued for exceedances of the VOC emission limit and failure to meet the destruction efficiency in FGOXID2. The facility completed repairs to the malfunctioning RTO and showed compliance with the emission limit through stack testing on December 9, 2022. As a result of this VN, the facility entered into Administrative Consent Order (ACO) 2023-07 with the Department to be effective for five (5) years.

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-DDGSLOADOUT, FGLOADOUT, and FGCORNBINS 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 unit(s) do not have potential pre-control emissions over the major source thresholds. EU-DDGSLOADOUT emissions are controlled by baghouses and FGCORNBINS emissions are controlled by bin vent filters.

FG-LOADOUT is not subject to emission limitations even though the units have control devices designed for VOC and PM10 destruction, respectively. The facility submitted a potential to emit calculation facility-wide, separated into individual emission units and flexible groups. The pre-controlled potential emissions are less than 100 tons per year; therefore, the sources are not subject to the CAM requirement.

Additionally, the pre-controlled potential emission rate of PM10 is less than 100 tons per year for EU-DDGSLOADOUT and FGCORNBINS; therefore, the flexible groups not subject to the CAM requirement.

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

<b>Emission Unit/Flexible group ID</b>	<b>Pollutant/ Emission Limit</b>	<b>UAR(s)</b>	<b>Control Equipment</b>	<b>Monitoring (Include Monitoring Range)</b>	<b>Emission Unit/Flexible Group for CAM</b>	<b>PAM? *</b>
FGC-20	PM10 =0.78 pph	40 CFR 52.21(c) & (d)	Baghouse C-20	Pressure drop; 0.5 to 8" WC Visible emissions	FGCAMUNITS	No
	PM2.5 = 0.78 pph	40 CFR 52.21(d)				

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
FGC-30	PM10 =0.73 pph	40 CFR 52.21(c) & (d)	Baghouse C-30	Pressure drop; 0.5 to 8" WC Visible emissions	FGCAMUNITS	No
	PM2.5 = 0.73 pph	40 CFR 52.21(d)				
FGMILL2	PM10 =0.64 pph	40 CFR 52.21(c) & (d)	Milling Baghouses C-30A-1, C-30A-2, C-30A-3, C-30A-4	Pressure drop; 0.5 to 8" WC Visible emissions	FGCAMUNITS	No
	PM2.5 = 0.64 pph	40 CFR 52.21(d)				
EU-COOLINGDRUM	PM10 =2.14 pph	40 CFR 52.21(c) & (d)	Baghouse C-70A	Pressure drop; 0.5 to 8" WC Visible emissions	FGCAMUNITS	No
	PM2.5 = 2.14 pph	40 CFR 52.21(d)				
FGFERM	VOC = 14 pph	R 336.1205(1), R 336.1702(a)	Scrubber C-40	Scrubber liquid flow rate = 46 Gallons per Minute (GPM) with pre-condenser operating, or 64 GPM without pre-condenser operating or a minimum flowrate established during the most recent performance test which showed compliance with the emission limits	FGCAMUNITS	No
	Acetaldehyde = 1.3pph	R 336.1205(1) R 336.1225				
	VOC=13 pph	R 336.1205(1), R 336.1702(a)	Scrubber C-40A	Scrubber liquid flow rate = 36 GPM with pre-condenser operating, or 64 GPM without pre-		

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
	Acetaldehyde = 0.93 pph	R 336.1205(1), R 336.1225		condenser operating or a minimum flowrate established during the most recent performance test which showed compliance with the emission limits		
FGOXID	VOC =4.2 pph	R 336.1702(a)	Thermal Oxidizer C-10	Combustion chamber temperature= Not less than 1450°F or not less than 50°F below the average combustion chamber temperature at which the VOC emission limit was met during the most recent compliance test, whichever is higher.	FGCAMUNITS	No
	CO =21.4 pph	40 CFR 52.21(d)				
	Acetaldehyde=0.35 pph	R 336.1205(1), R 336.1225				
	PM2.5 = 3.1 pph	40 CFR 52.21(d)				
	PM10 = 3.1 pph	40 CFR 52.21(c) and (d)				
FGOXID2	VOC =4.5 pph	R 336.1702(a)	Regenerative Thermal Oxidizer C-10	Combustion chamber temperature= Not less than 1650°F or not less than 50°F below the average combustion chamber temperature at which the VOC emission limit was met during the	FGCAMUNITS	No
	CO =9.1 pph	40 CFR 52.21(d)				
	Acetaldehyde=0.33 pph	R 336.1205(1), R 336.1225				
	PM2.5 = 5.01 pph	40 CFR 52.21(d)				

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
	PM10 = 5.01 pph	40 CFR 52.21(c) and (d)		most recent compliance test, whichever is higher.		

\*Presumptively Acceptable Monitoring (PAM)

The CAM Plan was updated by the facility in October 2022 and reflects the most current operating scenario at the facility. The facility has the following emission units and flexible groups subject to CAM: FGFERM, FGOXID, FGOXID2, FGC-20, FGC-30, FGMILL2, and EU-COOLINGDRUM. These emission units and flexible groups are subject to CAM for a number of pollutants including VOC, PM10, PM2.5, and CO. To control for these pollutants, the facility uses different types of control technologies.

The CAM plan is organized by control technology. FGC-20, FGC-30, FGMILL2, and EU-COOLINGDRUM all utilize pulse-jet baghouses to control for PM10 and PM2.5. For the baghouses, the facility monitors the pressure drop and visible emissions from the baghouses. Regular maintenance is performed on the baghouses to ensure proper operation.

Visible emissions were selected as a performance indicator because it is indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust. Any increase in visible emissions indicates reduced performance of a particulate control device.

In general, baghouses are designed to operate at a relatively constant pressure drop. Monitoring pressure drop provides a means of detecting a change in operation that could lead to an increase in emissions. An increase in pressure drop can indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged, the bags are becoming inefficient, or the airflow has increased. A decrease in pressure drop may indicate broken or loose bags that are also indicated by the presence of visible emissions. A pressure drop across the baghouse also serves to indicate that there is airflow through the control device.

The lower limit of the range for the first indicator - baghouse pressure drop - is based on the pressure drops, observed during the initial 2007 and subsequent 2017 and 2019 stack testing of the sources. The upper end of the range that will trigger a maintenance response is based on the manufacturer's recommendation. As the pressure drop approaches 8 in. water, the bags are scheduled for replacement. The second indicator is the presence of "no visible" emissions. An indicator of "no visible emissions" was selected because: (1) an observation of visible emissions is indicative of particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired.

Performance tests were conducted for the baghouses to verify PM emission limits as per the requirement of the facility's permit to install. There were no exceedances of the PM emission limitations.

FGFERM is controlled by two scrubbers, C-40 and C-40A, to control for VOC. These are two packed tower scrubbers to control VOC emissions from the fermenters and the beerwell. The facility monitors the gallons per minute water flow rate for each scrubber as a measure of proper operation. A minimum water flow must be supplied to absorb the given amount of VOC in the flue gas stream. The flow rate is determined by the most recent compliance test in 2021 where the VOC limit was met. An excursion of the scrubber flow rate triggers an inspection and appropriate corrective action.

FGOXID and FGOXID2 are controlled by a thermal oxidizer (TO) C-10 and regenerative thermal oxidizer (RTO) C-10A, respectively. The TO and RTO control for VOC, CO, PM10, PM2.5 (condensable organic fraction), and Acetaldehyde.

The performance indicators selected are the combustion chamber temperature, and annual burner inspection. The temperature of the combustion chamber provides a good indication of thermal oxidizer performance. As temperature increases, control efficiency also increases. Low combustion temperature indicates potential for insufficient destruction of CO and thus increases CO emissions. By maintaining the operating temperature at or above a minimum, a level of control efficiency can be expected to be achieved. Annual burner inspection helps to maintain proper burner operation and efficiency. The combustion temperature of the respective chambers is monitored. The minimum combustion chamber temperature is determined by the most recent compliance test where the pollution limits were met.

An excursion of the temperature will trigger an alarm, an inspection, and corrective action. Performance testing was conducted to verify compliance with the VOC emission limits and the VOC destruction efficiency as per the requirement of the facility’s permit to install.

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-B8570-2015 are identified in Appendix 6 of the ROP.

PTI Number			
120-05H	120-05J	144-15A	144-15B
144-15C			

**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
NA	Corn Oil Extraction Unit	Rule 212(4)(h)	Rule 284(2)(i)
NA	Sulfuric Acid Storage Tank	Rule 212(4)(h)	Rule 284(2)(h)(i)

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
NA	Parts Washer	Rule 212(4)(b)	Rule 281(2)(k)

**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 Rex Lane, Kalamazoo 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  
B8570

**RENEWABLE OPERATING PERMIT**  
**April 26, 2023 - STAFF REPORT ADDENDUM**

ROP Number  
MI-ROP-B8570-2023

**Purpose**

A Staff Report dated March 20, 2023, 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:	Harley Darnell, Plant Manager 517-629-9428
AQD Contact:	Amanda Cross, Senior Environmental Quality Analyst 269-910-2109

**Summary of Pertinent Comments**

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

**Changes to the March 20, 2023 Draft ROP**

No changes were made to the draft ROP.

State Registration Number

B8570

## RENEWABLE OPERATING PERMIT

October 31, 2023 - STAFF REPORT FOR RULE  
216(2) MINOR MODIFICATION

ROP Number

MI-ROP-B8570-2023a

### Purpose

On June 15, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B8570-2023 to The Andersons Marathon Holdings, LLC pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

### General Information

Responsible Official:	Ted Hafer, Vice President - Ethanol Operations
AQD Contact:	Caryn Owens, Senior Environmental Engineer 231-878-6688
Application Number:	202300142
Date Application for Minor Modification was Submitted:	September 13, 2023

### Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

### Description of Changes to the ROP

Minor Modification Number 202300142 was to incorporate PTI 119-19C which was to pull EU-DIESELPUMP2 from PTI 144-15C that corrected errors in emission unit description, removed redacted federal regulation and updated conditions to match current formats. Additionally, moved EU-DAYBIN1 into correct Flexible Group FGC-30. Associated emission units and flexible groups were carried forward in the PTI.

### 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 EGLE

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B8570-2023, 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 United States Environmental Protection Agency (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.