

State Registration  
Number  
N1604

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N1604-2018a

**Kent County Waste-to-Energy Facility**

SRN: N1604

Located at

950 Market Avenue SW, Grand Rapids, Kent, Michigan 49503

Permit Number: MI-ROP-N1604-2018a

Staff Report Date: February 5, 2018

Amended Date: December 15, 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) 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**

**February 5, 2018 - STAFF REPORT**

**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:	Kent County Waste-to-Energy Facility 950 Market Street SW Grand Rapids, Michigan 49503
Source Registration Number (SRN):	N1604
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:	201700073
Responsible Official:	Darwin Baas, Director, Kent County Department of Public Works 616-632-7919
AQD Contact:	April Lazzaro, Senior Environmental Quality Analyst 616-558-1092
Date Application Received:	May 19, 2017
Date Application Was Administratively Complete:	May 19, 2017
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	February 5, 2018
Deadline for Public Comment:	March 7, 2018

## Source Description

The Kent County Waste-to-Energy Facility power plant is located in Grand Rapids, Kent County, Michigan. The plant is owned by the Kent County Department of Public Works and operated by Covanta Energy. The facility is a 625 ton per day waste-to-energy facility firing municipal solid waste and natural gas operating two identical municipal solid waste mass burn waterwall combustors that can be co-fired with natural gas. The two combustors produce steam that is converted into electrical generation. Each combustor is equipped with a baghouse, a dry scrubber, a carbon injection system, and a selective non catalytic reaction system. Support equipment and operations on-site consist of ash and lime handling systems.

The facility is located on the Grand River just southwest of downtown Grand Rapids. The immediate surrounding area is largely industrial.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2016**.

### TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	8.9
Lead (Pb)	0.01
Nitrogen Oxides (NO <sub>x</sub> )	262
Particulate Matter (PM)	0.06
Sulfur Dioxide (SO <sub>2</sub> )	11.6
Volatile Organic Compounds (VOCs)	0.21

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2016 by Kent County Waste to Energy:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Arsenic	0.0002
Beryllium	0.0000296
Cadmium	0.0002
Chrome	0.0003
Hydrochloric Acid	10.4
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>10.4</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 located in Kent 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 of sulfur dioxide and nitrogen oxides 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.

EU-ASHSYSTEM, EU-LIMESYSTEM, EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) at the stationary source were subject to review under the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of sulfur dioxide and nitrogen oxides was greater than 100 tons per year. Emission levels of particulate matter, carbon monoxide, lead, mercury, sulfuric acid mist, and beryllium were also subject to PSD review.

The stationary source is subject to emission requirements and compliance schedules promulgated in 40 CFR Part 62 Subpart FFF- Federal Plan requirements for Large Municipal Waste Combustors constructed on or before September 20, 1994, which references and incorporates portions of 40 CFR Part 60 Subpart Eb. The Federal Plan implements the Emission Guidelines found in 40 CFR Part 60 Subpart Eb, however the Federal Plan was not updated to reflect revisions to Subpart Eb. Michigan's Air Pollution Control Rule R 336.1932 was rescinded in 2015, and replaced by R 336.1973, and as such the permit has been revised to reflect that change. In the meantime, additional updates to R 336.1973 are being made and the changes to the rule have not been through the complete rulemaking process and as such it is not part of an approved State Implementation Plan (SIP). Upon federal approval of R 336.1973 into the SIP, the permit will be revised and the references to 40 CFR Part 62 Subpart FFFF will be removed. In the meantime, the underlying applicable requirement of 40 CFR Part 62, Subpart FFF will remain along with Rule 336.1213(2) that reflects the state authority to implement parts of the Emissions Guidelines found in 40 CFR Part 60 Subpart Cb.

EU-PUMPHOUSE-1 and EU-PUMPHOUSE-2 at the stationary source are subject to the Maximum Achievable Control Technology Standards for Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ. In the case of EU-PUMPHOUSE-2, this rule in turn directs compliance requirements to New Source Performance Standards, 40 CFR Part 60, Subparts A and IIII.

The facility is not subject to National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers promulgated in 40 CFR Part 63, Subpart Q, since the on-site cooling towers do not use chromium-based water treatment chemicals.

The facility is not subject to Acid Rain requirements of Title IV of the Clean Air Act, based on the size of the electrical generator (approximately 18.1 megawatts.)

A Fugitive Dust Control Strategy, Rule 911 Malfunction Abatement Plan, and a Consolidated Plan for Waste and Odors (Handling of Hazardous or Unacceptable Waste/Odor Control Strategy Program) are referenced and required by this ROP.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the DEQ, AQD's, Procedure for Evaluating Periodic Monitoring Submittals dated June 19, 1996.

The emission limitations or standards from EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) for sulfur dioxide, carbon monoxide, nitrogen oxides and hydrochloric acid with the underlying applicable requirement of 40 CFR Part 62, Subpart FFF are exempt from the federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR Part 64 pursuant to 40 CFR 64.2(b)(1)(i) because they were proposed pursuant to section 111 of the Clean Air Act.

The emission limitations or standards from EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) for lead and mercury are exempt from the federal Compliance Assurance Monitoring regulation under 40 CFR Part 64 because the potential pre-control emissions are less than the amount, in tons per year, required for a source to be classified as a major source.

The emission limitations or standards derived from new source review for nitrogen oxides from EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) at the stationary source are exempt from CAM because the control device is not needed to meet the pound per hour emission limit or the concentration based emission limits. The emission limitations or standards derived from new source review for sulfur dioxide from EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) at the stationary source are exempt from CAM because the control device is not needed to meet the concentration based emission limits. The emission limitations or standards derived for the emission limitations or standards derived from new source review for Hydrochloric Acid are exempt from CAM because they are not federally enforceable.

The emission limitations or standards for particulate matter from EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) at the stationary source are subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64. Each emission unit has a control device and potential pre-control emissions of particulate matter greater than the major source threshold level. The relationship of opacity and PM emissions is subject to considerable variability. When researching the monitoring approach, historical facility stack test PM data vs. opacity was reviewed. There were numerous instances when the opacity was zero, yet there was measurable PM, and vice versa (e.g. the opacity was 1-2%, yet the measured PM was lower than some years were the opacity was zero). Therefore, Kent County Waste to Energy determined that opacity is not the correct indicator for compliance assurance monitoring. Baghouse differential pressure was selected because it is indicative of baghouse operation. Monitoring baghouse differential pressure provides a means of detecting a change in operation that could lead to an increase in emissions.

Emission Unit ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring	Presumptively Acceptable Monitoring?
EU-UNIT-1	Particulate Matter/ 2.6 pounds per hour; 0.010 grain/dscf, corrected to 7% oxygen	40 CFR 52.21(j)	Baghouse	Baghouse pressure drop.	No
EU-UNIT-2	Particulate Matter/ 2.6 pounds per hour; 0.010 grain/dscf, corrected to 7% oxygen	40 CFR 52.21(j)	Baghouse	Baghouse pressure drop.	No

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-N1604-2013 are identified in Appendix 6 of the ROP.

PTI Number			
375-87B			

### 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
FG-COMBUSTORS	SC I.1	25 mg/dscm PM, corrected to 7% oxygen  <b>40 CFR 60.33b(a)(1)(i)</b>	27 mg/dscm PM, corrected to 7% oxygen  <b>40 CFR 60.14103(a)(1)</b>	The PM limit of 27 mg/dscm corrected to 7% oxygen is less stringent.
FG-COMBUSTORS	SC I.29	0.400 milligram lead, per dry standard cubic meter, corrected to 7% oxygen  <b>40 CFR 60.33b(a)(4)</b>	0.440 milligram lead, per dry standard cubic meter, corrected to 7% oxygen  <b>40 CFR 62.14103(a)(2)</b>	The Lead limit of 0.440 milligram lead, per dry standard cubic meter, corrected to 7% oxygen is less stringent.
FG-COMBUSTORS	SC I.32	0.050 milligram mercury, per dry standard cubic meter, or 15% of potential emissions, whichever is less stringent, corrected to 7% oxygen  <b>40 CFR 60.33b(a)(3)</b>	80 microgram mercury per dry standard cubic meter, or 15% of the potential mercury emission concentration (85% reduction by weight), corrected to 7% oxygen, whichever is less stringent  <b>40 CFR 62.14103(a)(3)</b>	The Mercury limit of 80 microgram per dry standard cubic meter, corrected to 7% oxygen is less stringent.
FG-COMBUSTORS	SC I.41	35 micrograms cadmium per dry standard cubic meter, corrected to 7% oxygen  <b>40 CFR 60.33b(a)(2)(i)</b>	0.40 milligram cadmium per dry standard cubic meter, corrected to 7% oxygen  <b>40 CFR 62.14103(a)(2)</b>	The Cadmium limit of 0.40 milligram per dry standard cubic meter, corrected to 7% oxygen is less stringent.

**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**

There were no processes listed in the ROP Application as exempt devices under Rule 212(4). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

However, in the previous renewal cycle, the following existing equipment was identified as exempt under Rule 212(3):

<b>Exempt Emission Unit ID</b>	<b>Description of Exempt Emission Unit</b>	<b>Rule 212 Exemption</b>	<b>Rule 201 Exemption</b>
EU-DOLOSILO	Storage silo for dolomite stone, used for ash conditioning.	R 336.1212(3)(e)	R 336.1284(2)(k)
EU-CARBONSILO	Storage silo for activated carbon, used in mercury control system.	R 336.1212(3)(e)	R 336.1284(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 the MDEQ, 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 Heidi Hollenbach, Grand Rapids 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.

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**RENEWABLE OPERATING PERMIT**

ROP Number  
MI-ROP-N1604-2018

**March 27, 2018 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated February 5, 2018, 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:	Darwin Baas, Director, Kent County Department of Public Works, 616-632-7979
AQD Contact:	April Lazzaro, Senior Environmental Quality Analyst 616-558-1092

**Summary of Pertinent Comments/Changes Made to ROP**

No comments were received from the public. Comments were received from USEPA and changes were made to the February 5, 2018 draft ROP as follows:

EPA Comment 1: Please clarify in the Staff Report the applicability of 40 CFR Part 60, Subpart Cb and 40 CFR Part 62, Subpart FFF to this source.

AQD Response: 40 CFR Part 60, Subpart Cb is not applicable to this source, therefore, all such references have been removed. 40 CFR Part 60, Subpart FFF applies until such time where Michigan Rule 932 is enacted into law.

EPA Comment 2: FG-COMBUSTORS: Please verify the underlying applicable requirements for the streamlined particulate matter (PM), cadmium, mercury, and lead limits.

AQD Response: The streamlined limits for particulate matter (PM), cadmium, mercury and lead have been clarified and changed to reflect that the federal plan, 40 CFR Part 62, Subpart FFF is being subsumed.

EPA Comment 3: EU-ASHSYSTEM and FG-COMBUSTORS- please verify that the emission limits, testing requirements, and monitoring requirements originating from 40 CFR Part 60, Subpart FFF cite the correct underlying applicable requirements.

AQD Response: Where applicable, underlying applicable requirements origins were corrected.

EPA Comment 4: FG-COMBUSTORS: Various testing/sampling and monitoring conditions in the permit state that they are being used for compliance with emission limits from 40 CFR Part 60, Subpart Eb. Though the testing and monitoring requirements from 40 CFR Part 60, Subpart Eb are incorporated by reference by 40 CFR Part 62, Subpart FFF and therefore apply to the source, the emission limits from the 40 CFR Part 60, Subpart Eb do not. Please revise these conditions as necessary to ensure that they refer to the correct applicable emission limit.

AQD Response: All references to 40 CFR Part 60, Subpart Eb have been removed from the permit.

EPA Comment 5: 40 CFR Part 60, Subpart Db applicability for FG-COMBUSTORS: Page 5 of the Staff Report states that this source is not subject to the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units. However, SC II.2 and II.3 for FG-COMBUSTORS cite the NSPS as an underlying applicable requirement. Please verify the applicability of 40 CFR Part 60, Subpart Db to this source and revise the permit as necessary to list the appropriate underlying applicable requirements in accordance with 40 CFR 70.6(a)(1). This also applies to SC VI.42 and SC IX.2 for FG-COMBUSTORS.

AQD Response: 40 CFR Part 60, Subpart Db is not applicable to this source. As such it has been removed from the permit.

EPA Comment 6: CAM applicability for NO<sub>x</sub> limits for FG-COMBUSTORS: According to page 6 of the Staff Report, EU-UNIT-1 and EU-UNIT-2 (FG-COMBUSTORS) are not subject to Compliance Assurance Monitoring (CAM) because the control device is not needed to meet the pounds per hour oxides of nitrogen (NO<sub>x</sub>) limits. However, these emission units are also subject to concentration NO<sub>x</sub> limits. Please verify CAM applicability for these concentration limits, in accordance with 40 CFR 64.2(a), and include CAM requirements in the permit as applicable.

AQD Response: FG-COMBUSTORS are not subject to CAM for NO<sub>x</sub> concentration limits because the control device is not needed to meet the emission limits. This has been clarified in the staff report.

EPA Comment 7: CAM applicability for SO<sub>2</sub> limits for FG-COMBUSTORS: The current applicability analysis in the Staff Report states that SO<sub>2</sub> limits derived from New Source Review are exempt from CAM because the FG-COMBUSTORS is subject to an NSPS. However, FG-COMBUSTORS is not subject to an NSPS. Please verify CAM applicability for the various SO<sub>2</sub> limits established during New Source Review in accordance with 40 CFR 64.2 and include the CAM requirements in the permit as applicable.

AQD Response: FG-COMBUSTORS are not subject to CAM for SO<sub>2</sub> concentration emission limits because the control device is not needed to meet the emission limits. This has been clarified in the staff report.

EPA Comment 8: EU-ASHSYSTEM, SC I.1: This limit originates from 40 CFR 62.14106(a) which lists the required observation period as 9 minutes per 3-hour period. In order to ensure the practical enforceability of this permit condition, please revise the condition to include the specific observation period.

AQD Response: The specific observation period has been added to the permit as requested.

EPA Comment 9: FG-COMBUSTORS, SC I.24: This pounds per hour HCl limit has a footnote 2 designation, but page 6 of the Staff Report indicates that this limit is not federally enforceable. Please review this limit to verify whether the "footnote 1" state enforceable-only designation or the "footnote 2" designation is correct, and revise the permit as appropriate. See R 336.1214a(3).

AQD Response: The "footnote 1" designation is correct, and the permit was changed to reflect that.

EPA Comment 10: Staff Report, page 8: The Staff Report states that SC II.5 and SC III.6 for FG-COMBUSTORS are being streamlined, but there does not appear to be a subsumed requirement. Please clarify whether or not these conditions are being streamlined.

AQD Response: SC II.5 and III.6 for FG-COMBUSTORS do not have a subsumed requirement, therefore, the streamlining has been removed.

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## RENEWABLE OPERATING PERMIT

ROP Number

N1604

**September 14, 2020 - STAFF REPORT FOR RULE  
217(2) REOPENING**

MI-ROP-N1604-2018a

### Purpose

On May 14, 2018, the Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-N1604-2018 to The Kent County Waste-to-Energy Facility pursuant to Rule 214 of the Michigan Air Pollution Control Rules. Once issued, the AQD is required to reopen the ROP if the criteria described in Rule 217 are met. Only those conditions to be added or changed in the ROP are to be considered during this public comment period. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 217.

### General Information

Responsible Official:	Darwin Baas, Director, Kent County Department of Public Works, 616-632-7979
AQD Contact:	Eric Grinstern, Environmental Quality Specialist, 616-558-0616
Date Public Comment Begins:	September 14, 2020
Deadline for Public Comment:	October 14, 2020

### Regulatory Analysis

The AQD has determined that the ROP must be reopened pursuant to Rule 217(2)(1) to incorporate updates to Michigan Air Pollution Control Rule 973 (R 336.1973), which were promulgated after the issuance of the ROP renewal.

### Description of Changes to the ROP

At the time of the most recent ROP renewal, updates to R 336.1973 were being made but had not been through the complete rulemaking process and as such were not part of an approved State Implementation Plan (SIP). R 336.1973 was created to enforce the standards listed in 40 CFR Part 60, Subpart Cb (New Source Performance Standard: Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors Constructed on or Before September 20, 1994) which are incorporated by reference in 40 CFR Part 62, Subpart FFF (Federal Plan Requirements for Large Municipal Waste Combustors Constructed on or Before September 20, 1994). It was originally promulgated in 2016 but inconsistencies between R 336.1973 and 40 CFR Part 60, Subpart Cb were identified. Corrections were made to R 336.1973, which was re-promulgated on January 2, 2019. The March 27, 2018 ROP Renewal Staff Report Addendum details that upon federal approval of R 336.1973 into the SIP, the permit would be revised and the references to 40 CFR Part 62, Subpart FFF would be removed. This reopening facilitates the replacement of references to 40 CFR Part 62, Subpart FFF with R 336.1973.

### **Action Taken by the Department**

The AQD proposes to approve this change to ROP No. MI-ROP-N1604-2018, which was reopened by the AQD to incorporate references to R 336.1973. A final decision on the approval of the revised ROP will not be made until the public and any affected states have had an opportunity to comment on the proposed changes to the ROP 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 Heidi G. Hollenbach, Grand Rapids District Supervisor. The final determination for approval of the revised ROP will be based on a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by the public, any affected states or the USEPA.

Michigan Department of Environment,  
Great Lakes, and Energy  
Air Quality Division

State Registration Number

**RENEWABLE OPERATING PERMIT**

ROP Number

N1604

**October 27, 2020 - STAFF REPORT ADDENDUM  
FOR RULE 217(2) REOPENING**

MI-ROP-N1604-2018a

**Purpose**

A Staff Report dated September 14, 2020, was developed to set forth the applicable requirements and factual basis for the draft reopening to Renewable Operating Permit's (ROP) terms and conditions as required by Rule 214(3) 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 reopening during the 30-day public and affected state(s) comment period as described in Rule 214(3) and (4). In addition, this addendum describes any changes to the proposed ROP reopening resulting from these pertinent comments.

**General Information**

Responsible Official:	Darwin Baas, Director, Kent County Department of Public Works, 616-632-7979
AQD Contact:	Eric Grinstern, Environmental Quality Specialist, 616-558-0616

**Summary of Pertinent Comments**

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

**Changes to the September 14, 2020 Draft ROP Reopening**

No changes were made to the draft ROP reopening.