

State Registration Number  
N6009

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N6009-2023

**Sauk Trail Development Landfill, Inc.  
and  
Canton Renewables, LLC**

State Registration Number (SRN): N6009

Located at

5011 and 4345 South Lilley Road, Canton Township, Wayne County, Michigan 48188

Permit Number: MI-ROP-N6009-2023

Staff Report Date: November 7, 2022

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

**RENEWABLE OPERATING PERMIT**

ROP Number

N6009

**November 7, 2022- STAFF REPORT**

MI-ROP-N6009-2023

**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:	Sauk Trail Development Landfill, Inc. Canton Renewables, LLC 5011 South Lilley Road and 4345 South Lilley Road Canton Township, Michigan 48188
Source Registration Number (SRN):	N6009
North American Industry Classification System (NAICS) Code:	5622012 221210
Number of Stationary Source Sections:	2
Is Application for a Renewal or Initial Issuance?	Renewal
Application Numbers:	201600189 / 201700044
Responsible Official – Section 1:	Braxton Mashburn, General Manager Sauk Trail Development Landfill, Inc. 734-516-6317
Responsible Official – Section 2:	Derek Kramer, Chief Operating Officer Archaea Energy / Canton Renewables, LLC 380-900-2739
AQD Contact - District Inspector:	Jonathan Lamb, Senior Environmental Quality Analyst 313-348-2527
AQD Contact – ROP Writer:	Matt Karl, Environmental Quality Analyst 517-282-2126
Date Application Received:	November 30, 2016 and March 14, 2017
Date Application Was Administratively Complete:	March 14, 2017
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	November 7, 2022
Deadline for Public Comment:	December 7, 2022

## Source Description

Sauk Trail Development Landfill, Inc. (owned/operated by Sauk Trail Development, Inc.) operates a municipal solid waste landfill, located at 5011 South Lilley Road, Canton Township, Wayne County, Michigan. Canton Renewables, LLC (operated by Archaea Energy, Inc.) operates a high BTU gas treatment plant located at 4345 South Lilley Road, Canton Township, Wayne County. Light industrial and commercial areas with some green spaces are located along the northern and western property lines. The nearest residential properties are located approximately one-quarter mile to the north and one-quarter mile to the east. A railroad easement runs along the southern boundary of the site.

The two companies have a contractual agreement in which Sauk Trail Development Landfill, Inc. (Sauk Trail) sells landfill gas to Canton Renewables, LLC (Canton Renewables). Together these entities comprise one single stationary source. Previously, the two entities were permitted under two different State Registration Numbers (SRNs) and Renewable Operating Permits (ROPs). The SRN for Sauk Trail was N6009 with the most recent ROP being ROP No. MI-ROP-N6009-2012. The SRN assigned to Canton Renewables was P0270 with the most recent ROP being ROP No. MI-ROP-P0270-2012a. On September 23, 2013, Michigan's Air Quality Division (AQD) determined one ROP would be issued to each single stationary source. Therefore, during this ROP renewal cycle, the AQD has combined the ROPs for Sauk Trail and Canton Renewables. Sauk Trail has been designated as Section 1 and Canton Renewables as Section 2. All tracking for the ROP renewal and future compliance activities for both entities will occur under the SRN N6009.

### Section 1:

Sauk Trail is classified as a Type II landfill or a Municipal Solid Waste (MSW) landfill. In Michigan, the Materials Management Division (MMD) establishes standards for Solid Waste Management. Rule 299.4104(d) defines a Type II landfill as:

"A landfill which receives household waste, municipal solid waste incinerator ash or sewage sludge and which is not a land application unit, surface impoundment, injection well, or waste pile. A municipal solid waste landfill also may receive other types of solid waste such as: construction and demolition waste, sewage sludge, commercial waste, nonhazardous sludge, hazardous waste from conditionally exempt small quantity generators, and industrial waste. Such a landfill may be publicly or privately owned."

Sauk Trail began accepting waste in 1974 and obtained a construction permit from the MMD on June 25, 1992, with landfill expansion permits approved on March 22, 2000, and May 8, 2008. Sauk Trail currently owns approximately 207 acres in total with 165 acres permitted and dedicated to waste placement. The current design capacity of the landfill is 31,198,182 megagrams (Mg) and the life expectancy of the landfill through at least the year 2032. The MMD identifies a portion of the landfill, 29.96 acres, with final cover/closed. All cells have been constructed and are accepting wastes.

Sauk Trail currently accepts municipal waste (mostly household and commercial), construction debris, demolition debris, and non-friable asbestos wastes. The landfill has previously and its currently permitted to accept friable asbestos wastes, however, Sauk Trail has not accepted this type of waste since 2013.

Waste materials arrive in a variety of vehicles that have the potential to generate fugitive particulate matter (PM) emissions; this is controlled by frequent wetting and sweeping of the entrance roads.

After waste is transported to the landfill, it is placed in one of the active working areas, known as cells, and is covered daily with soil or other cover materials. When a cell reaches its design capacity, a liner is installed to cover the waste. Over time, natural biological processes transform the waste materials and produce leachate and landfill gas (LFG). Initially, decomposition is aerobic until the oxygen supply is exhausted. Anaerobic decomposition of buried refuse creates most of the LFG. The LFG is comprised mostly of methane (CH<sub>4</sub>), carbon dioxide (CO<sub>2</sub>), carbon monoxide (CO), hydrogen sulfide (H<sub>2</sub>S), volatile organic compounds (VOC) and non-methane organic compounds (NMOC). NMOC is the primary regulated

air pollutant associated with LFG generation. The landfill has been evaluated to have greater than 34 Mg in NMOC emissions.

The landfill has installed a landfill gas collection and control system (GCCS). The GCCS uses a series of interconnected wells, horizontal collectors, surface collectors and other gas extraction devices operating under negative pressure to collect LFG throughout the landfill and move the gas to one of the pollution control devices. Sauk trail can route the LFG to two (2) open flare controls rated at 1500 standard cubic feet per minute (scfm) and 4200 scfm. LFG can also be sent to Canton Renewables high British thermal unit (BTU) gas treatment plant as described further in Section 2 below.

Additionally, Sauk Trail operates one (1) cold cleaner for maintenance purposes.

Section 2:

Canton Renewables converts LFG generated by Sauk Trail into pipeline quality natural gas. The resultant pipeline quality natural gas is sent into the existing natural gas distribution system. The Canton Renewables renewable natural gas (RNG) facility is designed to accept up to 4,000 scfm of inlet LGG. Waste gas from the landfill gas treatment process is controlled using a regenerative thermal oxidizer (EURTO). EURTO has a design capacity of 4,200 scfm and is required to operate at a minimum temperature of 1,400 °F with a 0.5 second retention time. Additional controls consist of a recuperative thermal oxidizer (EUTRO) to control the waste gases off the nitrogen rejection unit (NRU) which has a design capacity of 3,200 scfm and an open flare which has a rated capacity of 4,200 scfm.

LFG is converted natural gas quality through a series of steps. Raw LFG is collected from Sauk Trail's GCCS under a negative pressure vacuum by two positive displacement Gardner Denver blowers. The LFG then passes through a desulfurization process and a series of gas chillers and moisture separators. After the LFG has been chilled and moisture has been removed, it passes through a scrubber filled with packing. The scrubber removes VOCs and CO<sub>2</sub> leaving CH<sub>4</sub>, N<sub>2</sub>, and O<sub>2</sub>. The stripper removes CO<sub>2</sub> and VOCs, which is sent to the regenerative thermal oxidizer (EURTO). After the scrubbers, process gas is sent to gas polishing, which consists of a set of three vessels, of which the first is filled with activated carbon followed by a dust filter. Process gas is then sent to a Watlow electric heater, and the temperature of the gas is raised to 550 °F and is passed through a De-Ox palladium catalyst to remove O<sub>2</sub>. Finally, process gas is sent to an oxygen and nitrogen rejection system (NRU) leaving high BTU methane gas, a.k.a. pipeline quality renewable natural gas. The resultant RNG is then compressed and sent into the existing natural gas distribution system. The off gas from the LFG compression and treatment process is sent to the regenerative thermal oxidizer (EURTO) and the recuperative thermal oxidizer (EUTRO). The NRU process equipment will discharge waste gas to EUTRO. The EUTRO is designed to operate between 1,500 °F and 1,800 °F with a guaranteed NMOC destruction efficiency of 98% or a reduction of the NMOC concentration to less than 20 ppmv at the outlet of the device. The EURTO combusts/oxidizes the NMOC portion of the raw LFG. The 4,200 scfm open flare control is used to combust process gas from the RNG facility which does not meet pipeline quality natural gas specifications. This scenario only occurs during times of startup, shutdown or a malfunction of the RNG processing plant. The open flare only accepts LFG which has already been treated and desulfurized. The open flare does not accept raw LFG.

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**

**Section 1: Sauk Trail**

Pollutant	Tons per Year
Carbon Monoxide (CO)	86.9
Nitrogen Oxides (NO <sub>x</sub> )	19.1
Particulate Matter (PM10)*	38.9
Sulfur Dioxide (SO <sub>2</sub> )	19.3
Volatile Organic Compounds (VOCs)	1.4

\* Particulate matter (PM) that has an aerodynamic diameter less than equal to a nominal 10 micrometers.

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

<b>Hazardous Air Pollutants (HAPs) **</b>	<b>Tons per Year</b>
NMOC (HAP Surrogate per 40 CFR Part 63 Subpart AAAA) - uncontrolled***	124.0
NMOC (HAP Surrogate per 40 CFR Part 63 Subpart AAAA) - fugitive***	31.0

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

\*\*\*Landgem output and fugitive emissions based on equation from the EGLE Supplemental Instructions for Municipal Solid Waste Landfills.

## Section 2: Canton Renewables

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	6.6
Nitrogen Oxides (NO <sub>x</sub> )	1.5
Particulate Matter (PM10)*	0.6
Sulfur Dioxide (SO <sub>2</sub> )	10.8
Volatile Organic Compounds (VOCs)	0.7

\* Particulate matter (PM) that has an aerodynamic diameter less than equal to a nominal 10 micrometers.

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

<b>Individual Hazardous Air Pollutants (HAPs) **</b>	<b>Tons per Year</b>
Hydrogen Chloride (HCl)	2.69
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>3.05</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 Wayne County, which is currently designated by the United States Environmental Protection Agency (USEPA) as a nonattainment 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 potential to emit of carbon monoxide and particulate matter exceeds 100 tons per year. The potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year. NMOC is considered a surrogate for HAPs, and the fugitive emissions of NMOC from the landfill exceed the major source threshold for HAPs. The source was subject to new source performance standard (NSPS), Subpart WWW that required an operating permit for the landfill under 40 CFR Part 70.

Emission units at the landfill (Section 1) have not been subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR Part 52.21 because at the time of New Source Review (NSR) permitting, the potential to emit of each criteria pollutant was less than 250 tons per year. In 2011, a "synthetic minor" permit limiting the potential to emit of carbon monoxide to less than 250 tons per year, Permit to Install (PTI) No. 122-11, was issued for open flares designed to combust gas associated with the operations of a municipal solid waste landfill. In the ROP, these emission units are under Section 1 in a flexible group, FGOPENFLARES.

Emission units at the gas plant (Section 2) have been determined to be "minor" with regard to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR Part 52.21 because at the time of New Source Review (NSR) permitting in PTI No. 98-11, which was issued in 2011, the potential to emit of each criteria pollutant was less determined to be less than 250 tons per year.

The stationary source was subject to the Standards of Performance for Municipal Solid Waste Landfills promulgated in 40 CFR Part 60, Subparts A and WWW. On June 21, 2021, the facility became subject to the Federal Plan Requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014 and have not been modified or reconstructed since July 17, 2014 as specified in 40 CFR Part 62, Subpart OOO. Sauk Trail is considered a legacy landfill under the Federal Plan. Michigan is not currently the authorized representative and is implementing and enforcing this regulation through the ROP.

The stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Asbestos promulgated in 40 CFR Part 61, Subparts A and M. The landfill has previously accepted and still can accept asbestos containing materials.

The stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as promulgated in 40 CFR Part 63, Subparts A and AAAA. The landfill has estimated NMOC emissions greater than 34 Mg per year and is required to install and operate an active landfill gas collection and control system. This subpart did require such landfills to meet the startup, shutdown, and malfunction (SSM) requirements of 40 CFR Part 63, Subpart A, General Provisions but now the standard applies at all times. After September 28, 2021, the permittee must comply with all applicable provisions per 40 CFR 63.1930(b). The permittee has opted to comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961) for a Municipal Solid Waste Landfill with a gas collection and control system used to comply with the provisions of 40 CFR 62.16714(b) and (c).

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."

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64. The emission limitation(s) or standard(s) for NMOC at the stationary source with the underlying applicable requirement(s) of 40 CFR Part 62, Subpart OOO and 40 CFR Part 63, Subpart AAAA are exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(i) because the emission limitations and standards meets the CAM exemption for regulations proposed after November 15, 1990.

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. There were no new PTIs issued after the effective date of ROP No. MI-ROP-N6009-2012. PTIs issued after the effective date of ROP No. MI-ROP-P0270-2012 are identified in Section 2 Appendix 6 of the ROP.

PTI Number			
98-11B	98-11C	98-11D	122-11

**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.

Section 1:

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
DVHEATERS-BLDG	Four (4) identical heating furnaces rated at 80,400 BTU/hr.	R 336.1212(4)(c)	R 336.1282(2)(b)(i)

Section 2:

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUPROPTANK	One (1) 500 gallon propane tank.	R 336.1212(4)(d)	R 336.1284(2)(b)
EUCONDTRTAT1	One (1) 2,500 gallon condensate treatment tank.	R 336.1212(4)(d)	R 336.1284(2)(e)
EUCONDTRTAT2	One (1) 2,000 gallon condensate treatment tank.	R 336.1212(4)(d)	R 336.1284(2)(e)
EUCONDTRTAT3	One (1) 330 gallon condensate treatment tank.	R 336.1212(4)(d)	R 336.1284(2)(e)
EUCONDTRTAT4	One (1) 330 gallon condensate treatment tank.	R 336.1212(4)(d)	R 336.1284(2)(e)
EUCONDTRTAT5	One (1) 330 gallon condensate treatment tank.	R 336.1212(4)(d)	R 336.1284(2)(e)
EUHYDROPEROX	One (1) 2,500 gallon hydrogen peroxide tank.	R 336.1212(4)(d)	R 336.1284(2)(i)

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

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements 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 Christopher Ethridge, Assistant Division Director. 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  
N6009

**RENEWABLE OPERATING PERMIT**  
**February 16, 2023 - STAFF REPORT ADDENDUM**

ROP Number  
MI-ROP-N6009-2023

**Purpose**

A Staff Report dated November 7, 2022, 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 – Section 1:	Braxton Mashburn, General Manager Sauk Trail Development Landfill, Inc. 734-516-6317
Responsible Official – Section 2:	Derek Kramer, Chief Operating Officer Archaea Energy / Canton Renewables, LLC 380-900-2739
AQD Contact - District Inspector:	Jonathan Lamb, Senior Environmental Quality Analyst 313-348-2527
AQD Contact – ROP Writer:	Matt Karl, Environmental Quality Analyst 517-282-2126

**Summary of Pertinent Comments**

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

**Changes to the November 7, 2022 Draft ROP**

Recently, the United State Environmental Protection Agency (USEPA) had commented on a landfill ROP that affected the landfill templates that were used in this ROP and therefore, the following changes have been made:

**SECTION 1:**

EUASBESTOS, SC III.1(d) has been removed from the ROP.

“and, if different, the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report.” was added to EUASBESTOS, SC VI.1(c) to completely incorporate 40 CFR 61.154(e)(3).

FGOPENFLARE-AAAA, VI.2(b), was changed to “Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.” to address the monthly visual inspection per 40 CFR 63.1961(c)(2)(ii).

In Appendix 7, typographical errors were corrected.

## SECTION 2:

FGTREATMENTSYS-AAAA, IV.2 added “A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.” to complete the condition from 40 CFR 63.1964(g)

FGOPENFLARE-AAAA, VI.2(b), was changed to “Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.” to address the monthly visual inspection per 40 CFR 63.1961(c)(2)(ii).

Canton Renewables, LLC noted that there are no bypass lines for the candlestick flare or initial gas treatment system. Canton Renewables requested that these conditions be removed. However, these conditions were added to incorporate federal language by EPA request. Therefore, the conditions will remain as written, but it is noted here that the requirements for “bypass lines” are not applicable, as there are no bypass lines present.

In Appendix 7, typographical errors were corrected.

Recently, additional changes were made to the landfill templates:

## SECTION 1:

EUASBESTOS SC IV.1, added references to 40 CFR Part 63, Subpart AAAA and UAR. Condition now reads:

“The placement of gas collection devices determined in paragraphs 40 CFR 62.16728(a)(1) and 40 CFR 63.1962(a)(1) must control all gas producing areas, except as provided by 40 CFR 62.16728(a)(3)(i) and (a)(3)(ii), and 40 CFR 63.1962(a)(3)(i) and (a)(3)(ii). **(40 CFR 62.16728(a)(3), 40 CFR 63.1962(a)(3))**

- a. Any segregated area of asbestos or non-degradable material may be excluded from collection if documented as provided under 40 CFR 62.16728(a)(3)(i) and 40 CFR 63.1983(d). The documentation must provide the nature, date of deposition, location and amount of asbestos or non-degradable material deposited in the area and shall be provided to the AQD upon request. **(40 CFR 62.16728(a)(3)(i), 40 CFR 63.1962(a)(3)(i))”**

EUASBESTOS SC VI.3, added references to 40 CFR Part 63, Subpart AAAA and UAR. Condition now reads:

“The permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or non-degradable waste excluded from collection as provided in 40 CFR 62.16728(a)(3)(i) and 40 CFR 63.1962(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in 40 CFR 62.16728(a)(3)(ii) and 40 CFR 63.1962(a)(3)(ii). **(40 CFR 62.16726(d)(2), 40 CFR 63.1983(d)(2))”**

## SECTION 2:

FGPLANT SC VI.1 updated reference from “Appendix A” to “Appendix 7-2.”

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**RENEWABLE OPERATING PERMIT**  
**April 4, 2023 - STAFF REPORT ADDENDUM**

ROP Number  
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**Purpose**

A Staff Report dated November 7, 2022, 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 45-day EPA 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 – Section 1:	Braxton Mashburn, General Manager Sauk Trail Development Landfill, Inc. 734-516-6317
Responsible Official – Section 2:	Derek Kramer, Chief Operating Officer Archaea Energy / Canton Renewables, LLC 380-900-2739
AQD Contact - District Inspector:	Jonathan Lamb, Senior Environmental Quality Analyst 313-348-2527
AQD Contact – ROP Writer:	Matt Karl, Environmental Quality Analyst 517-282-2126

**Summary of Pertinent Comments**

No pertinent comments were received during the 45-day EPA comment period.

However, comments were received by USEPA regarding a lack of recordkeeping for material contents to demonstrate compliance on the AQD Cold Cleaner template in another ROP.

**Changes to the February 16, 2023 Proposed ROP**

Due to the comment received by USEPA on the AQD Cold Cleaner template, the following change has been made to the flexible group conditions for FGCOLDLEANERS:

In Section VI Monitoring/Recordkeeping, added the following special condition as the third condition:

“The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component, used in each cold cleaner. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**”