

State Registration Number  
N6521

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N6521-2020a

**Zeeland Generating Station**

State Registration Number (SRN): N6521

Located at

425 Fairview Road, Zeeland, Ottawa County, Michigan 49464

Permit Number: MI-ROP-N6521-2020a

Staff Report Date: February 10, 2020

Amended Date: April 12, 2021

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>February 10, 2020 - STAFF REPORT</b>	<b>3</b>
<b>March 25, 2020 - STAFF REPORT ADDENDUM</b>	<b>11</b>
<b>April 12, 2021 - STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT</b>	<b>14</b>

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## RENEWABLE OPERATING PERMIT

ROP Number

February 10, 2020 - STAFF REPORT

MI-ROP-N6521-2020

### 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:	Zeeland Generating Station 425 Fairview Road Zeeland, Michigan 49464
Source Registration Number (SRN):	N6521
North American Industry Classification System (NAICS) Code:	221112
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900136
Responsible Officials:	John P. Broschak, VP of Generation Operations and Compression 616-738-3718  Loren P. Barnes, Plant Business Manager 616-237-4001
AQD Contact:	Kaitlyn DeVries, Environmental Quality Analyst 616-558-0552
Date Application Received:	August 19, 2019
Date Application Was Administratively Complete:	August 19, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	February 10, 2020
Deadline for Public Comment:	March 11, 2020

## Source Description

The Zeeland Generating Station, which is owned and operated by Consumers Energy Company, is a natural gas-fired electrical generation facility located in Zeeland, Ottawa County, Michigan. The facility is on the Northeast side of the city of Zeeland, in a predominantly industrial and agricultural area. The facility itself consists of two (2) combustion turbines operating in simple cycle mode, and two (2) additional combustion turbines, two (2) duct burners, and a steam generator collectively operating in combined cycle mode. Each of the four (4) General Electric 7FA combustion turbines is equipped with a low-NOx combustor system. Nitrogen Oxide (NOx) emissions from the turbines and duct burners operating in the combined cycle mode are controlled by Selective Catalytic Reduction (SCR) using aqueous ammonia as the reactant. NOx and Carbon Monoxide (CO) emissions from each turbine are monitored via continuous emissions monitoring systems (CEMS). The total output for the facility is approximately 800 megawatts.

Additional support equipment for the facility includes one (1) natural gas-fired auxiliary boiler, a gas-fired emergency generator, a diesel fueled fire pump engine, and a cold cleaner.

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**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	118.1
Lead (Pb)	0
Nitrogen Oxides (NO <sub>x</sub> )	191.3
Particulate Matter (PM)	39.28
Sulfur Dioxide (SO <sub>2</sub> )	7.6
Volatile Organic Compounds (VOCs)	9.05

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

<b>Individual Hazardous Air Pollutants (HAPs) **</b>	<b>Tons per Year</b>
Formaldehyde	<b>2.11</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 Ottawa 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 carbon monoxide, nitrogen oxides, PM-10, and volatile organic compounds exceeds 100 tons per year.

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.

The stationary source was 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 carbon monoxide, nitrogen oxides, PM-10, and Volatile Organic Compounds was greater than 100 tons per year.

In addition to PSD-required best available control technology (BACT), VOC emissions were evaluated relative to Rule 702. Emissions of individual toxic air contaminants (formaldehyde, ammonia) were evaluated relative to Michigan's Air Toxic regulations per Rules 224 and 225.

In the previous iteration of the ROP the AQD modified the monitoring of FGCOMBINEDCYCLE when operations are at 60% load or less to allow the stationary source flexibility. The facility has identified that based on historic summer Net Demonstrated Capability testing, 60% load equates to 95.4 megawatts, per each combined cycle unit combustion turbine, on a gross basis. Additional recordkeeping requirements have also been added to ensure enforceability. Net Demonstrated Capability testing is required to be conducted each year for the North American Electric Reliability Corporation and is used to verify the capacity of an Electric Generating Unit (EGU). The average summer gross electrical output capability for EUGT2A and EUGT2B is approximately 159 megawatts (MW) per EGU.

EUNEWAXBLR at the stationary source is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Dc.

FGSIMPLECYCLE (EUGT1A and EUGT1B) and FGCOMBINEDCYCLE (EUGT2A with or without EUDUCTBURNER2A and EUGT2B with or without EUDUCTBURNER2B) at the stationary source are subject to the Standards of Performance for Stationary Gas Turbines promulgated in 40 CFR Part 60, Subparts A and GG.

FGCOMBINEDCYCLE (EUGT2A with or without EUDUCTBURNER2A and EUGT2B with or without EUDUCTBURNER2B) at the stationary source is subject to the Standards of Performance for Electric Utility Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Da.

FGCIRICEMACT (EUFIREPUMP) at the stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ (Area Source RICE MACT).

EUGENERATOR at the stationary source is classified as new under the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ (Area Source RICE MACT). Due to the age and size of this emission unit, the provisions of 40 CFR Part 63, Subpart ZZZZ (63.6590(c)(1)) indicate that the unit shall comply with the applicable provisions of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and JJJJ. However, based upon the installation date of this emergency engine (ordered October 21, 2008), NSPS Subpart JJJJ (60.4230(a)(4)(iv)) does not impose any requirements.

EUGT1A, EUGT1B, EUGT2A, EUGT2B, EUDUCTBURNER2A, EUDUCTBURNER2B, at the stationary source are subject to the federal Acid Rain program promulgated in 40 CFR Part 72.

EUGT1A, EUGT1B, EUGT2A, EUGT2B, EUDUCTBURNER2A, EUDUCTBURNER2B, at the stationary source are subject to the Cross-State Air Pollution Rule NO<sub>x</sub> Annual Trading Program pursuant to 40 CFR Part 97, Subpart AAAAA.

EUGT1A, EUGT1B, EUGT2A, EUGT2B, EUDUCTBURNER2A, EUDUCTBURNER2B, at the stationary source are subject to the Cross-State Air Pollution Rule NO<sub>x</sub> Ozone Season Group 2 Trading Program pursuant to 40 CFR Part 97, Subpart EEEEE.

EUGT1A, EUGT1B, EUGT2A, EUGT2B, EUDUCTBURNER2A, EUDUCTBURNER2B, at the stationary source are subject to the Cross-State Air Pollution Rule SO<sub>2</sub> Group 1 Trading Program pursuant to 40 CFR Part 97, Subpart CCCCC.

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."

The ppmv at 15% oxygen emission and the pound per million BTU heat input limitations for Nitrogen Oxides from FGCOMBINEDCYCLE at the stationary source are exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(vi), because the emission limits are monitored on a continuous basis, meeting the CAM exemption for a continuous compliance determination method. Nitrogen Oxides (NO<sub>x</sub>) is directly measured in parts per million (ppm) from the continuous emissions monitoring system (CEMS), and the pound per million BTU heat input is calculated from the CEMS reading. Additionally, the specified emission limit in ppmv is equivalent to the pound per million BTU limit located in FGCOMBINEDCYCLE.

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-N6521-2015a are identified in Appendix 6 of the ROP.

PTI Number			
267-98	267-98A		

**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
FGSIMPLECYCLE	SC I.2	9.0 ppmv NO <sub>x</sub> at 15% oxygen, dry (This is equivalent to 0.04 pound per million BTU heat input)	108 ppmv NO <sub>x</sub> , at 15% oxygen, dry <b>40 CFR 60.332(a)(1)</b>	The NO <sub>x</sub> concentration of 108 ppmv at 15% oxygen is less stringent.
FGSIMPLECYCLE	SC II.1	Pipeline quality natural gas is defined as 0.0006 lb./MMBTU sulfur	0.8% by weight or 8,000 ppm by weight total	8,000 ppm by volume total

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
		content, which is equivalent to 0.2 grains total sulfur per 100 scf, 6.8 ppm by weight total sulfur or 3.4 ppm by volume total sulfur	sulfur. <b>40 CFR 60.333(b)</b>	sulfur is less stringent.
FGSIMPLECYCLE	SC VI.3	The permittee shall install, calibrate, maintain and operate CEMS for NOx emissions from each turbine in FGSIMPLECYCLE on a continuous basis and according to the procedures outlined in Appendix 3.1 and 40 CFR 75.	<p>The permittee received approval of alternative monitoring protocol to demonstrate compliance with 40 CFR Part 60, Subpart GG on June 20, 2002. This approval precedes the rule incorporation as identified below.</p> <p>The owner or operator may, but is not required to, for purposes of determining excess emissions, use a CEMS that meets the requirements of Part 75. <b>40 CFR 60.334(c)</b></p>	<p>The June 20, 2002 letter from US EPA Region V allows the facility to utilize a certified CEMS in lieu of Method 20 for purposes of demonstrating continuous compliance with the 40 CFR NOx emission limit.</p> <p>Part 75 linearity requirements include three gas levels as opposed to two gas levels for a cylinder gas audit (CGA) and the standard linearity specification is 5% versus 15% for a CGA; therefore, a CGA is less stringent than a linearity test.</p>
FGSIMPLECYCLE	SC VI.5	The permittee shall keep, in a satisfactory manner, daily average NOx emission calculation records for each turbine in FGSIMPLECYCLE	The permittee received approval of alternative monitoring protocol to demonstrate compliance with 40 CFR Part 60, Subpart GG on June 20, 2002. This approval precedes the	The June 20, 2002 letter from US EPA Region V allows the facility to utilize a certified CEMS in lieu of Method 20 for purposes of demonstrating continuous compliance with

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
			<p>rule incorporation as identified below.</p> <p>The owner or operator may, but is not required to, for purposes of determining excess emissions, use a CEMS that meets the requirements of Part 75.</p> <p><b>40 CFR 60.334(c)</b></p>	<p>the 40 CFR NOx emission limit.</p> <p>Part 75 linearity requirements include three gas levels as opposed to two gas levels for a cylinder gas audit (CGA) and the standard linearity specification is 5% versus 15% for a CGA; therefore, a CGA is less stringent than a linearity test.</p>
FGCOMBINEDCYCLE	SC I.3	3.5 ppmv NOx, at 15% oxygen, dry <sup>2</sup> * (This is equivalent to 0.013 pound per million BTU heat input)	<p>108 ppmv NOx, at 15% oxygen, dry</p> <p>1.6 pounds per megawatt-hour</p> <p><b>40 CFR 60.332(a)(1), 40 CFR 60.44Da(d)(1)</b></p>	<p>108 ppmv NOx, at 15% oxygen, dry and 1.6 pounds per megawatt-hour are less stringent.</p>
FGCOMBINEDCYCLE	SC II.1	Pipeline quality natural gas is defined as 0.0006 lb/MMBTU sulfur content, which is equivalent to 0.2 grains total sulfur per 100 scf, 6.8 ppm by weight total sulfur or 3.4 ppm by volume total sulfur	<p>0.8% by weight or 8,000 ppm by weight total sulfur.</p> <p><b>40 CFR 60.333(b)</b></p> <p>0.20 lb/MMBTU heat input.</p> <p><b>40 CFR 60.43Da(b)</b></p>	<p>8,000 ppm by volume total sulfur is less stringent.</p> <p>0.20 lb/mmBTU heat input is less stringent</p>
FGCOMBINEDCYCLE	SC VI.4	The permittee shall install, calibrate, maintain and operate CEMS for NOx emissions from each turbine/duct burner set in FGCOMBINEDCYCLE on a continuous basis and according to the procedures outlined in	The permittee received approval of alternative monitoring protocol to demonstrate compliance with 40 CFR Part 60, Subpart GG on June 20, 2002.	The June 20, 2002 letter from US EPA Region V allows the facility to utilize a certified CEMS in lieu of Method 20 for purposes of demonstrating continuous

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
		Appendix 3.1 and 40 CFR 75.	<p>This approval precedes the rule incorporation as identified below.</p> <p>The owner or operator may, but is not required to, for purposes of determining excess emissions, use a CEMS that meets the requirements of Part 75.</p> <p><b>40 CFR 60.334(c)</b></p>	compliance with the 40 CFR NOx emission limit. Part 75 linearity requirements include three gas levels as opposed to two gas levels for a cylinder gas audit (CGA) and the standard linearity specification is 5% versus 15% for a CGA; therefore, a CGA is less stringent than a linearity test.

### 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
EUGENERATOR	Natural Gas-fired reciprocating engine which is used to supply emergency power; rated at 454 hp	Rule 212(4)(e)	Rule 285(2)(g)
EUSTBLDGHTRS	Eighteen (18) Steam Turbine Building natural gas-fired heaters. (100,000 BTU/hr/unit)	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUAUXBLRBLDGHTRS	Four (4) Auxiliary Boiler Building natural gas fired heaters. (100,000 BTU/hr/unit)	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUADMINBLDGHVAC1	Two (2) Administration Building natural gas fired commercial HVAC. (90,000 BTU/hr/unit)	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUADMINBLDGHVAC2	One (1) Administration Building natural gas fired commercial HVAC. (115,000 BTU/hr)	Rule 212(4)(c)	Rule 282(2)(b)(i)

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212(4) Citation</b>	<b>PTI Exemption Rule Citation</b>
EUWRHSEBLDGHTRS	Four (4) Warehouse Building natural gas-fired heaters. (105,000 BTU/hr/unit)	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUWRHSEBLDGHVAC	Two (2) Warehouse Building natural gas-fired residential HVAC. (1 at 100,000 BTU/hr and 1 at 80,000 BTU/hr )	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUDWBLDGHTRS	Two (2) Deep Well Injection Building propane fired heaters. (100,000 BTU/hr/unit)	Rule 212(4)(c)	Rule 282(2)(b)(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 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.

State Registration Number  
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## RENEWABLE OPERATING PERMIT

ROP Number  
MI-ROP-N6521-2020

March 25, 2020 - STAFF REPORT ADDENDUM

### Purpose

A Staff Report dated February 10, 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

Responsible Official:	John P. Broschak, VP of Generation Operations and Compression 616-738-3718  Loren P. Barnes, Plant Business Manager 616-237-4001
AQD Contact:	Kaitlyn DeVries, Environmental Quality Analyst 616-558-0552

### Summary of Pertinent Comments

The following comments were received from Consumers Energy - Zeeland Generating Station (Company) during the 30-day public comment period.

#### Company Comment 1:

Flexible Group FGSIMPLECYCLE, Special Condition V.2 (Page 19/62): In the table listing the Test Method Reference, the reference for PM10, Condensable is listed as 40 CFR Part 61, Appendix M. Per our previous comments, I believe that this reference should be 40 CFR Part 51, Appendix M (there is no Appendix M to 40 CFR Part 61). The recommended citation is titled "Recommended Test Methods for State Implementation Plans" and contains EPA Method 202 for condensable PM emissions measurement.

#### AQD Response:

Flexible Group FGSIMPLECYCLE Special Condition V.2 currently references 40 CFR Part 61, Appendix M for the PM10 Condensables. This should indeed be Part 51, not Part 61 and will be updated to reflect this change.

#### Company Comment 2:

Flexible Group FGCOMBINEDCYCLE, Special Condition I.14 (Page 26/62): This condition relates to clarifying that startup and shutdown emissions are not included when assessing compliance with certain short term (i.e. daily) emission limits. In the proposed ROP, the list of emission limits for which startup and shutdown are excluded currently include SC I.2, I.3, I.5, I.7, I.9, I.10 and I.13, but SC I.10 (the 12-month rolling VOC emission limit for each combined cycle turbine) should not be included in this list. The exclusion of startup and shutdown VOC emissions would be inconsistent with the intent of this condition,

which is to ensure that there is a VOC BACT limit which applies during all periods of operation (with the short term VOC limit not applying during periods of startup and shutdown). Also, the facility's data acquisition and handling systems (DAHS) is configured to calculate VOC mass emissions during all periods of operation based upon application of lb/mmBtu emission factors derived from periodic stack testing coupled with real-time heat input determinations.

AQD Response:

In Flexible Group FGCOMBINEDCYCLE, Special Condition I.14, it lists several emission units that have startup and shutdown emissions excluded when assessing compliance. The emission limit outlined in Special Condition I.10, is for the 12-month rolling VOC emission limit for each combined cycle turbine. Due to some changes in the renewal of this ROP, the numbering of the emission limits changed in the table outlined in FGCOMBINEDCYCLE, thus this was an error. The 12-month rolling VOC emission limit is not included in the emission limits that do not have to account for startup and shutdown emission limits. As a result of this comment, Special Condition I.14 of FGCOMBINEDCYCLE had the reference to Special Condition I.10 removed.

Company Comment 3:

Flexible Group FGCOMBINEDCYCLE, Special Condition V.2 (Page 27/62): Please refer to the comment provided above for this similar condition for FGSIMPLECYCLE; the test method reference for PM10, condensable is 40 CFR Part 61, Appendix M, but should be 40 CFR Part 51, Appendix M.

AQD Response:

Flexible Group FGCOMBINEDCYCLE, Special Condition V.2 currently references 40 CFR Part 61, Appendix M for the PM10 Condensables. This should indeed be Part 51, not Part 61 and will be updated to reflect this change.

Company Comment 4:

As part of this process, I noticed that Michigan R 336.1299(d) is referenced for both FGSIMPLECYCLE and FGCOMBINEDCYCLE as the only Underlying Applicable Requirement (UAR) for Special Condition IX.1, and within the text of Special Condition IX.2. It is also referenced within the Acid Rain Permit (see Page 46/62, in the 1st paragraph). Based upon a review of current Part 2 regulations, it appears as though R 336.1299 was rescinded as part of 2016 AACS. The old rule related to the adoption of standards by reference, with R 336.1299(d) specific to the federal Acid Rain Program. I believe that the old references in R 336.1299(d) are now housed within R 336.1902(1)(p)-(s).

AQD Response:

Special Condition IX.1 of FGSIMPLECYCLE and FGCOMBINEDCYCLE did reference Michigan R 336.1299(d), and this has been rescinded. The correct UAR should be R 336.1902(1)(q). This will be updated in these locations to reflect the correct UAR.

**Changes to the February 10, 2020 Draft ROP**

The following changes were made to the February 10, 2020 Draft ROP in response to the comments noted above.

In response to Company Comments 1 and 3 the Test Method Reference Table for Special Condition V.2 of FGSIMPLECYCLE and FGCOMBINEDCYCLE were updated to reference 40 CFR Part 51, Appendix M instead of 40 CFR Part 61, Appendix M.

In response to Company Comment 2, Special Condition I.14 was updated to remove the reference to Special Condition I.10, which is not included as part of the emission limits that do not have to include times of startup and shutdown.

In response to Company Comment 4, the UAR's for FGSIMPLECYCLE and FGCOMBINEDCYCLE, Special Condition IX.1 have been updated to (R 336.1902(1)(q)), which is the appropriate UAR due to the rescission of R 336.1299.

State Registration Number

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## RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-N6521-2020a

### April 12, 2021 - STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT

#### Purpose

On May 14, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-N6521-2020 to Zeeland Generating Station 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(1)(a)(i-iv).

#### General Information

Responsible Official:	Jason L. Ricketts, Plant Manager
AQD Contact:	Caryn Owens, Environmental Engineer 231-878-6688
Application Number:	202100047
Date Application for Administrative Amendment was Submitted:	March 5, 2021

#### Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to Rule 216(1)(a)(i).

#### Description of Changes to the ROP

Administrative Amendment Number 202100047 was to correct a typographical error in FGRICEMACT, SC III.8, which mistakenly references spark plugs in lieu of air cleaner. The typographical error has been corrected, and the Condition states: "For existing emergency CI RICE, the permittee shall inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary."

#### 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 Administrative Amendment to the ROP.

#### Action Taken by EGLE

The AQD approved an Administrative Amendment to ROP No. MI-ROP-N6521-2020, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.