
From: Diaz, Stephanie <diaz.stephanie@epa.gov>
Sent: Wednesday, November 29, 2017 3:21 PM
To: Kovalchick, Mike (DEQ); Miller, Scott (DEQ); Ethridge, Christopher (DEQ)
Cc: Valenziano, Beth; Blathras, Constantine; Damico, Genevieve
Subject: USEPA Comments RE: Start of 30 day comment period for the draft ROP for Ervin Amasteel (SRN B1754)

Hello Mike, Scott, and Chris,

Here are our comments on the Ervin Amasteel draft ROP renewal. I'd be happy to discuss if you have any questions.

Thanks!

Stephanie Diaz
EPA Region 5 – Air Permits Section
312-353-1907

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP) for Ervin Amasteel Division, State Registration Number B1754, located in Adrian, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. EU0009: The staff report indicates that EU009 is subject to Compliance Assurance Monitoring (CAM) pursuant to 40 CFR Part 64 and notes that the monitoring for the control device is daily recording of the pressure drop across the bag house and daily observations of the baghouse vent for opacity. The Staff Report states that these monitoring requirements are from 40 CFR Part 63, Subpart YYYYY – National Emissions Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities and that these requirements are considered to be presumptively acceptable monitoring for CAM. However, 40 CFR § 60.10686(e) requires monitoring of the capture system and PM control devices, along with recordkeeping and reporting, according to the CAM requirements in 40 CFR Part 64. Furthermore, the permit does not include the applicable CAM requirements as specified in 40 CFR § 64.6(c) and the Michigan Department of Environmental Quality's CAM example table template. Please verify CAM applicability and include the CAM requirements in the permit as applicable. Note also that, in accordance with 40 CFR § 64.2(a)(1), units subject to both CAM exempt and nonexempt emission limitations or standards remain subject to CAM for the nonexempt limitations or standards.
2. FG0009: In order to clearly identify the origin and authority and permanency of the federal Consent Order provisions established in Consent Order No. EPA-5-17-113(a)-MI-05, please review and add Act 451, Section 324.5503(b) as an underlying applicable requirement and footnote 3 to SC III.2 and SC IV.5 as appropriate.
3. FGMACT-YYYYY: the visible emissions limits (both labelled as SC I.2) list test protocol as the time period/operating scenario. FGMACT-YYYYY consists of FG0009 which does include a time period/operating scenario for similar requirements. We recommend that the time period/operating scenario for the conditions in FGMACT-YYYYY be updated to reflect an appropriate averaging time consistent with the other visible emissions limits to which this emission unit is subject.
4. FGSI-RICEMACT, page 31: The origin and authority for SC III.4 appears to inadvertently refer to the requirements for compression ignition combustion engines and may need to be updated to cite to the requirements for spark

ignition combustion engines (i.e. on page 31, SC III.4 cites 40 CFR § 63.6625(i) when it should cite 40 CFR § 63.6625(j)).

From: Carley, Brian (DEQ) [mailto:CARLEYB@michigan.gov]

Sent: Thursday, October 26, 2017 8:59 AM

To: Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Diaz, Stephanie <diaz.stephanie@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>

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Subject: Start of 30 day comment period for the draft ROP for Ervin Amasteel (SRN B1754)

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number {MI-ROP-B1754-20XX}, for Ervin Amsteel Division (State Registration Number: B1754), located in Adrian, Lenawee County, Michigan. The public comment period begins on October 30, 2017 and will end on November 29, 2017.

The Public Notice, Renewal ROP Application, Draft ROP, plans referenced in the ROP and the Staff Report are available through the internet. The documents are located at the following address:

<http://www.michigan.gov/deq/0,4561,7-135-3310-389493--,00.html>

Any comments that you could provide prior to the actual 45-day Environmental Protection Agency notice period would be appreciated. Comments can be e-mailed to Mike Kovalchick (kovalchickm@michigan.gov), Senior Environmental Engineer, DEQ, Jackson District Office. Please copy Scott Miller (millers@michigan.gov), Jackson District Supervisor, DEQ and Chris Etheridge (etheridgec@michigan.gov), Field Operations Manager, DEQ.

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