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Sent: Tuesday, October 15, 2024 11:17 AM
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Subject: EPA Comments for B1909 ROP

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Good Morning,

EPA has reviewed the draft ROP currently out for renewal for CWC Textron (SRN: B1909) and would like to provide the following comments based on our review. Please let me know if you have any questions.

- 1) Special condition VI.1 for EU-BULK-BOND requires non-certified visible emission readings only once per week while the emission unit is operating as a means of monitoring compliance with the applicable emission limit. This potentially leaves room for the emission unit in question to be operating and not have any monitoring that would assure compliance with the applicable PM emission limits under SC.I 1 & 2. EPA suggests this condition be revised to include language that provides for a monitoring method to be required whenever the unit is actually operating. EPA further suggests that any other similar condition in the ROP that has potential for no monitoring to be required while an emission unit is actually operating to be revised as well and include such language necessary to ensure appropriate monitoring.
- 2) EU-DUCTILE-IRON contains an emission limit of 10% opacity under SC I.4 with the only applicable monitoring/testing method referenced being “verification of visible emissions [...] performed and documented once weekly by non-certified visible emissions readings while the emission unit is operating, per Appendix 3” under SC VI.4. It is not clear how a once weekly verification of visible emissions by a non-certified reading ensures compliance with a continuous 10% opacity limit under this condition or in Appendix 3. EPA suggests for this and any other similar condition within the ROP with monitoring that is related to a specific opacity to have an approved testing method included when necessary.

- 3) The CAM plan for this ROP also includes specific opacities (10-20%) that use non-certified VE observations to be taken daily as their monitoring requirements. It is not clear though how a non-certified VE observation taken daily is capable of ensuring compliance with the specific opacities listed within the plan. In addition, the QA/QC component of the CAM plan only lists “routine preventative maintenance” as part of its criteria. EPA suggests that the monitoring requirements for opacity as specified by the CAM plan be revised to also include an applicable approved test method instead of just a daily non-certified VE observation, and for the QA/QC component to be more specific with how it will ensure that the other sections of CAM continue to reasonably assure compliance with all applicable requirements.

Regards,

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