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**From:** Valenziano, Beth [mailto:valenziano.beth@epa.gov]  
**Sent:** Tuesday, October 24, 2017 3:30 PM  
**To:** Kovalchick, Mike (DEQ); Miller, Scott (DEQ); Ethridge, Christopher (DEQ)  
**Cc:** Damico, Genevieve; Diaz, Stephanie; Blathras, Constantine  
**Subject:** EPA comments RE: draft ROP for Inteva Products (SRN: B6027)

Hello Mike, Scott, and Chris,

Here are our comments on Inteva Product's draft ROP renewal. If you have any questions, please let me know and we can discuss further.

Thank you!  
Beth Valenziano  
Air Permits Section  
Air and Radiation Division  
USEPA Region 5  
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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for Inteva Products, State Registration Number B6027, 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. EU-Paint1: Malfunction Abatement Plan (MAP) and FG-MACTPPPP: Startup, Shutdown and Malfunction Plan (SSMP)

The permit record includes a document entitled, "Management of Abatement Equipment CK#3," last revised 5/6/2016. Please verify that this document meets the content requirements of the MAP and the SSMP, as described below, or include additional documentation in the permit record as necessary.

EU-Paint1, section III.4. requires a MAP in accordance with R 336.1911 for the water-wash system, rotary carbon concentrator, and the regenerative thermal oxidizer, and specifies a list of minimum requirements for MAP content, including:

- a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of which major replacement parts will be maintained in inventory.
- b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

In addition, FG-MACTPPPP, section III.3. requires an SSMP in accordance with 40 CFR §63.6(e)(3) and 40 CFR §63.4500(c) if the source is using the emission capture system and add-on control device compliance option. This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of

the emission capture system or the add-on control device. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

2. EU-Paint1: Compliance Assurance Monitoring (CAM)

The staff report indicates that EU-Paint1 is subject to CAM pursuant to 40 CFR Part 64, and notes that the monitoring for the control device is desorption gas inlet temperature in the concentrator and monitoring of the temperature in the combustion chamber of the thermal oxidizer in order to ensure efficient capture and destruction of the emissions. However, 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, in accordance with 40 CFR §64.2, 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.

3. EU-Paint1: Section I.1. and Sections VI.6. and VI.7

Sections VI.6 and VI.7 include monitoring and recordkeeping requirements associated with the 40 ton per year, 12- month rolling average volatile organic compound (VOC) limit in Section I.1. Section VI.7. generally requires VOC mass emission calculations determining the monthly emission rate during periods of regenerative thermal oxidizer (RTO) operation and RTO by-pass in tons per calendar month, and VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. Although the permit includes recordkeeping requirements for calculating emissions on a mass balance basis, the permit does not specify the emissions calculations when the RTO and the rotary carbon concentrator are in operation. Please revise the permit and the Staff Report as appropriate to address the specific monitoring, recordkeeping, and calculations necessary to assure compliance with the VOC emissions limits when the control equipment is operating, in accordance with 40 CFR §70.6(a)(3) and (c)(1). Please consider, as appropriate, performance testing, variability of emissions, vendor guarantees, capture efficiency, destruction efficiency, retention time, and operating parameters such as the rotary carbon concentrator gas inlet temperature and the RTO temperature.

4. EU-P5: Sections II.2. and II.3.

These two material limits include a "footnote 2" federally enforceable designation, but the permit identifies the underlying applicable requirement as R 336.1225. Please review these limits 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).

5. EU-Paint3: Section I.1. and Section VI.4.

The VOC limit in Section I.1. does not include a "footnote 2" designation. Please verify whether the limit is a Title I federally enforceable condition pursuant to Rule 201(1)(a) and include footnote 2 as appropriate. See R 336.1214a(3).

In addition, the monitoring and recordkeeping requirements in Section VI.4. appear to be missing recordkeeping requirements for materials reclaimed. Please revise the permit as necessary to address the specific monitoring and recordkeeping requirements necessary to assure compliance with the VOC emissions limit, in accordance with 40 CFR §70.6(a)(3) and (c)(1).

6. Flexible Group Summary Table: FG-MACTPPPP

The flexible group description for FG-MACTPPPP misidentifies 40 CFR Part 63, Subpart PPPP as Surface Coating of Automobiles and Light Duty Trucks. Please revise the description to identify Subpart PPPP as Surface Coating of Plastic Parts and Products.

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

**Sent:** Thursday, September 21, 2017 8:06 AM

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**Subject:** Start of 30 day comment period for the draft ROP for Inteva Products (SRN: B6027)

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B6027-20XX, for Inteva Products, LLC-Adrian Operations, (State Registration Number: B6027), located in Adrian, Lenawee County, Michigan. The public comment period begins on September 25, 2017, and will end on October 25, 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.htm>

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](mailto:kovalchickm@michigan.gov)), Senior Environmental Engineer, DEQ, Jackson District Office. Please copy Scott Miller ([millers@michigan.gov](mailto:millers@michigan.gov)), Jackson District Supervisor, DEQ and Chris Etheridge, [etheridgec@michigan.gov](mailto:etheridgec@michigan.gov), Field Operations Manager, DEQ.

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