
From: Valenziano, Beth <valenziano.beth@epa.gov>
Sent: Thursday, November 3, 2016 1:56 AM
To: Hollenbach, Heidi (DEQ); DeVries, Kaitlyn (DEQ)
Cc: Ethridge, Christopher (DEQ); Blathras, Constantine; Damico, Genevieve
Subject: EPA comments on draft ROP renewal for Atlas EPS (N1794)

Hello Heidi and Kaitlyn,

EPA has the following comments regarding the draft Renewable Operating Permit (ROP), for Atlas EPS, a Division of Atlas Roofing Corporation (State Registration Number: N1794), located in Kent County, Michigan. As I discussed with Kaitlyn today, our comments are primarily questions pertaining to the operation of the oxidizer, and the associated compliance and monitoring requirements pertaining to the VOC emissions limits.

If you have any questions, please let me know. Thanks!

Beth Valenziano
Air Permits Section
Air and Radiation Division
EPA Region 5
312-886-2703

1. Staff Report, Compliance Assurance Monitoring (CAM). Please verify the following with respect to the information in the CAM table and provide additional information if necessary.
 - a. The Emission Limit column should include the 272.4 lb/hr and 374.5 tpy VOC limits.
 - b. The UAR(s) column should include R 336.1220(1)(a)(i)(A), R 336.1702, and R 336.2908.
 - c. The Presumptively Acceptable Monitoring column should denote “no” or “not applicable” because the source is not subject to other federal monitoring requirements for VOC emissions and/or the oxidizer.
2. FG-EPS Section II, VI.5 VI.7., and Appendix 3 require the permittee to determine VOC content of the pre-expanded EPS beads. However, these conditions do not appear to specify a method for determining VOC content of the beads. Please verify that the permit includes the conditions sufficient to assure compliance with the lb/hr and tpy VOC limits and the EPS bead throughput limit, in accordance with 40 Code of Federal Regulations (CFR) §70.6(c)(1).
3. FG-EPS, Section V.4. This condition requires the permittee to determine the VOC content, as shipped, of product from FG-EPS. As written, this condition does not specify the calculation method for determining VOC retention in product. As this information is necessary to determine compliance with the lb/hr and tpy VOC limits and the EPS bead throughput limit, please provide additional information regarding VOC in product retention calculations. In addition, please verify that the permit includes the associated monitoring, recordkeeping, and calculations sufficient to assure compliance with the emissions and throughput limits, in accordance with 40 CFR §70.6(c)(1).
4. FG-EPS Section VI.4. requires the permittee to record total pounds of regrind shipped and the VOC content of the regrind. How is VOC content of the regrind calculated? Should this calculation also be addressed in Section V.4, retention of VOC in product?. Please clarify the VOC calculation requirements for the regrind material, as appropriate.

5. FG-EPS, Sections II, VI, and Appendix 3 include a 95% destruction efficiency factor for the oxidizer when calculating compliance with throughput and emissions limitations. Do performance tests and work practice standards support the use of 95% destruction efficiency at all times? Is the 95% destruction efficiency calculation appropriate if work practice standards are not met? Please verify that the 95% factor is sufficient to assure compliance with the emissions and throughput limits, in accordance with 40 CFR §70.6(c)(1), and revise the permit if necessary.
6. FG-EVS Section III.5. references Appendix 3 for a corrective action plan, but this appendix does not include corrective action provisions. Please update the permit as necessary to further address the CAM provisions required by 40 CFR 64.7(d).
7. FG-EPS and Appendix 3. It is not clear whether the compliance monitoring and calculation permit conditions associated with the VOC emissions limitations take any uncaptured VOC emissions into account. Please provide additional information pertaining to uncaptured emissions and verify that the permit includes monitoring, recordkeeping, and calculations sufficient to assure compliance with the VOC limits, in accordance with 40 CFR §70.6(c)(1).
8. FG-EPS, Section IV.2 includes a minimum oxidizer retention time of 0.25 seconds. Please provide additional information pertaining to this operational requirement and if necessary add permit conditions sufficient to assure compliance with the retention time, in accordance with 40 CFR Part 64 and §70.6(c)(1).

From: Hollenbach, Heidi (DEQ) [mailto:HOLLENBACHH@michigan.gov]

Sent: Monday, October 03, 2016 7:48 AM

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

Cc: DeVries, Kaitlyn (DEQ) <DeVriesK1@michigan.gov>; Ethridge, Christopher (DEQ) <ETHRIDGEC@michigan.gov>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>

Subject: 30 Day Public Notice - Atlas ROP Renewal (N1794)

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-N1794-20XX, for Atlas EPS, a Division of Atlas Roofing Corporation (State Registration Number: N1794), located in Byron Center, Kent County, Michigan. The public comment period begins on October 3, 2016 and will end on November 2, 2016.

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.deq.state.mi.us/aps/downloads/rop/pub_ntce/pub_ntce.shtml

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 Kaitlyn DeVries (devriesk1@michigan.gov), Environmental Quality Analyst, DEQ, Grand Rapids District Office. Please copy Heidi Hollenbach (hollenbachh@michigan.gov), Grand Rapids District Supervisor, DEQ, and Chris Ethridge (ethridgec@michigan.gov), Acting Field Operations Supervisor, DEQ.

Thanks,
Heidi

Heidi Hollenbach
Grand Rapids District Supervisor
Air Quality Division
Michigan Department of Environmental Quality

