

**From:** [Chapel, Amanda \(EGLE\)](#)  
**To:** [Orent, Kelly \(EGLE\)](#)  
**Cc:** [Cosier, Dina \(EGLE\)](#)  
**Subject:** FW: Public comments on N5814  
**Date:** Friday, May 7, 2021 10:15:55 AM

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Hi Kelly,

Here is a copy of the email from EPA about their comments. I added the addendum to the staff report detailing the comments and changes as well.

Thanks.

Amanda

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**From:** Blathras, Constantine <blathras.constantine@epa.gov>  
**Sent:** Thursday, April 29, 2021 10:39 AM  
**To:** Chapel, Amanda (EGLE) <ChapelA@michigan.gov>  
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**Subject:** Public comments on N5814

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Hello,

Thank you for the opportunity to discuss the draft ROP for Asama Coldwater Manufacturing and EPA's April 23, 2021 email containing our initial comments on the draft ROP. Per our discussion on April 29, 2021, EGLE will revise the draft ROP to include the O&M plan as part of period monitoring for both the George Fischer and DISA foundries for the baghouses. EPA is pleased to know that a BLDS is in place for both baghouse foundries. EGLE will also include Michigan's rule R 336.2810 as an underlying applicable requirement for EU-DSCOOLSHOT, on the PM10 emission limit in addition to the Federal PSD requirement of 52.21(j).

EPA has no further comments on the draft ROP.

Thanks again for working with us on our comments. If you have any questions, please feel free to contact me.

Dino Blathras  
EPA Region 5

Hello,

I'm reviewing the draft ROP for Asama Coldwater Manufacturing. I have a couple of questions on the draft ROP I would like to talk to you about.

1. In particular, I'm interested in the process and operational restriction permit conditions between the various baghouses. For some of the EUs the permit condition for baghouse maintenance varies greatly on what the practical enforceability is from a simple "operate properly" to a full out requirement to comply with an O&M plan, with baghouse pressure drop readings and BLDS. Can the language applying the practices from the O&M plan be included in all the baghouse references? See below for the examples I've cited on the baghouse conditions.

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III. PROCESS/OPERATIONAL RESTRICTION(S) 1. The permittee shall not operate EU-GFMELTPOUR unless the associated baghouse is installed, maintained, and operated in a **satisfactory manner**.2 (R 336.1910) **[Satisfactory manner not defined]**

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III. PROCESS/OPERATIONAL RESTRICTION(S) 1. The permittee shall not operate EU-SHOTBLAST unless the associated baghouse is **installed and operating properly**.2 (R 336.1910) **[Properly not defined, does not include "satisfactory manner"]**

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IV. DESIGN/EQUIPMENT PARAMETER(S) 1. The permittee shall not operate EU-DSMELTPOUR unless the associated capture system and baghouse control system are installed and operating in accordance with **the approved operation and maintenance (O&M) plan**.2 (R 336.1224, R 336.1225, R 336.1910, 40 CFR 52.21(j), 40 CFR Part 63.6 (e)(1)(i), 40 CFR 63.7710)

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1.The permittee shall not operate EU-DSCOOLSHAK unless the associated capture system, regenerative thermal oxidizer (RTO), and baghouse control system are installed, operated and maintained in accordance **with the approved operation and maintenance (O&M) plan**.2 (R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, R 336.1910, 40 CFR 52.21(j), 40 CFR 63.6(e)(1)(i), 40 CFR 63.7690(b), 40 CFR 63.7710)

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IV. DESIGN/EQUIPMENT PARAMETER(S) 1. The permittee shall not operate EU-DSMOLDSAND unless the associated capture system and baghouse control system are installed, operated and maintained in accordance with the **approved operation and maintenance (O&M) plan**.2 (R 336.1224, R 336.1225, R 336.1910, 40 CFR 52.21(j))

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VI. MONITORING/RECORDKEEPING Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii)) 1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a **gauge to monitor and record the pressure drop across the EU-DSCOOLSHOT baghouse on a continuous basis** when the baghouse is operating.2 (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1901, R 336.1910, 40 CFR 52.21(j))

2) On page 33 of the draft ROP for EU-DSCOOLSHOT, the PM10 emission limit has an underlying applicable requirement of 40 CFR 52.21(j) only. As this is a BACT emission limit, would you not also include the applicable rule from MI's Part 18 PSD rule ( R.336.28XX) as a UAR?

Thank you for the opportunity to review the draft ROP. Please let me know when you are available to discuss these question.

Thanks.

Dino Blathras

EPA Region 5