

From: Diaz, Stephanie
To: [Lane, Rex \(DEQ\)](#); [Douglas, Mary \(DEQ\)](#); [Ethridge, Christopher \(DEQ\)](#); [Orent, Kelly \(DEQ\)](#)
Cc: [Valenziano, Beth](#); [Damico, Genevieve](#); [Blathras, Constantine](#)
Subject: USEPA Comments RE: 30 day public comment period Real Alloy Specification and Real Alloy Recycling (N5957)
Coldwater, Branch County, Michigan
Date: Tuesday, May 8, 2018 5:48:22 PM

Hello everyone,

Here are my comments for Real Alloy Specification and Real Alloy Recycling draft ROP. If you have any questions, you can reach out to either me or Beth.

Thanks!

Stephanie Díaz
EPA Region 5 – Air Permits Section
(312) 353-1907



The U.S. Environmental Protection Agency has reviewed the draft renewal of Renewable Operating Permit for Real Alloy Specification, Inc. and Real Alloy Recycling, Inc., State Registration Number N5957, located in Coldwater, 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. *Streamlining of emissions limits for group 1 furnaces*
Several of the emissions limits from 40 CFR Part 63, Subpart RRR appear to have been streamlined with New Source Review emissions limits. For example, SC I.1 for FGALFURN1/2/7/8 is a 0.35 pounds of hydrogen chloride (HCl) per ton of feed/charge which appears to streamline the emissions limit of 0.40 pounds of HCl per ton of feed/charge from Subpart RRR. However, there is no discussion in the Staff Report and no indication in the permit that the Subpart RRR limit has been streamlined/subsumed. Please either 1) update the Staff Report in accordance with Michigan's Staff Report streamlined limits template and add streamlining/subsuming conditions to the permit, or 2) add the applicable Subpart RRR requirements to the permit. For further information, please refer to EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program."

Note that this comment applies to several conditions for the following units:
FGALFURN1/2/7/8, EUIMREVERBFURN, FGIMROFURN1/2.

2. *Incorporation of the Secondary Aluminum Processing Unit (SAPU) emissions limits*
40 CFR §63.1505(k) contains particulate matter, HCl, and dioxins/furans emissions limits for SAPUs. These limits are the weighted average of the emissions limits for the individual emissions units that comprise the SAPU. Though compliance with the SAPU limits may be demonstrated through compliance with the applicable emissions limits of each emission unit

within the SAPU in accordance with 40 CFR §63.1505(k)(4), the emissions limits for the SAPU are still applicable requirements and should be included in the permit. Please incorporate the SAPU emissions limits into the permit as applicable in accordance with 40 CFR §70.6(a)(1).

Note that group 1 furnaces are part of the SAPU, and as mentioned in the previous comment, several of the Subpart RRR limits appear to be streamlined. The permit should be very clear on which limits are being used to determine the SAPU limits.

3. *Incorporation of monitoring requirements from 40 CFR Part 63, Subpart RRR*
40 CFR §63.1510 lists various monitoring requirements, including requirements for monitoring the afterburners, the fabric filter inlet temperature, and the lime injection rate for lime-inject fabric filters on group 1 furnaces. While the permit does contain conditions for operating emission units in accordance with the Operation, Management, and Monitoring plan which includes requirements from 40 CFR §63.1510, the specific monitoring conditions listed in 40 CFR §63.1510 are applicable requirements and should be included in the permit in accordance with 40 CFR §70.6(a)(1). Please incorporate monitoring conditions from 40 CFR Part 63, Subpart RRR, including but not limited to 40 CFR §63.1510(g), (h), (i), and (j), for the following units: EUALDRYER3, EUIMDRYER, EUALFURN1, EUALFURN7, EUALFURN8, EUIMREFERBFURN, FGIMROTFURN1/2.
4. *Improper origin and authority for emissions limits*
Various ton per year emissions limits for several emission units cite 40 CFR Part 63, Subpart RRR as the underlying origin and authority. While these limits were calculated based on the pound per hour emissions limits in Subpart RRR, the ton per year limits are not from Subpart RRR. Please update the underlying origin and authority in accordance with 40 CFR §70.6(a)(1)(i) for the following emission units: FGALFURN1/2/7/8, EUIMDRYER, EUIMREFERBFURN, FGIMROTFURN1/2.
5. *Improper origin and authority for monitoring requirement*
EUALDRYER3, SC III.4, a condition which lists requirements for the fabric filter system, cites 40 CFR Part 63, Subpart RRR as the underlying origin and authority. Subpart RRR, however, does not require chip dryers to have a fabric filter system or list any requirements for fabric filter systems for chip dryers. Please update the origin and authority of this condition in accordance with 40 CFR § 70.6(a)(1)(i).

From: Douglas, Mary (DEQ) [mailto:DOUGLASM@michigan.gov]

Sent: Wednesday, April 4, 2018 2:11 PM

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

Cc: 'jbrush@idem.in.gov' <jbrush@idem.in.gov>; 'Andrew.hall@epa.ohio.gov' <Andrew.hall@epa.ohio.gov>; Ethridge, Christopher (DEQ) <ETHRIDGEC@michigan.gov>; Lane, Rex (DEQ) <LANER@michigan.gov>; Orent, Kelly (DEQ) <ORENTK@michigan.gov>; Frens, Colleen (DEQ) <FRENSC@michigan.gov>

Subject: 30 day public comment period Real Alloy Specification and Real Alloy Recycling (N5957) Coldwater, Branch County, Michigan

Good afternoon all:

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-N5957-20XX, for Real Alloy Specification and Real Alloy Recycling (State

Registration Number: N5957), located in Coldwater, Branch County, Michigan. The public comment period begins on April 9, 2018 and will end on May 9, 2018.

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 Rex Lane (laner@michigan.gov), Senior Environmental Quality Analyst, DEQ, Kalamazoo District Office. Please copy Mary Douglas (douglasm@michigan.gov), Kalamazoo District Supervisor, DEQ, Christopher Ethridge (ethridgec@michigan.gov), Field Operations Manager, DEQ, and Kelly Orent, (orentk@michigan.gov), DEQ.

Thanks

Mary

Mary Douglas
Air Quality Division
Kalamazoo District Office
269-567-3545
douglasm@michigan.gov