
From: Valenziano, Beth <valenziano.beth@epa.gov>
Sent: Tuesday, April 4, 2017 5:51 PM
To: Hollenbach, Heidi (DEQ); DeVries, Kaitlyn (DEQ); Ethridge, Christopher (DEQ)
Cc: Diaz, Stephanie; Damico, Genevieve; Blathras, Constantine
Subject: EPA comments RE: 30 Day Public Comment - Plasan Initial ROP (P0374)

Follow Up Flag: Follow up
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Hello Kaitlyn, Heidi, and Chris,

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

Thanks,
Beth Valenziano
Air Permits Section
Air and Radiation Division
USEPA Region 5
312-886-2703

The U.S. Environmental Protection Agency has reviewed the draft initial Renewable Operating Permit for Plasan Carbon Composites and Plasan North America, State Registration Number P0374, located in Walker, 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. Staff Report. Please supplement the permit record to provide information supporting the facility-wide potential to emit (PTE) limitations of 9.9 tons per year (TPY), 12 month rolling average for each individual hazardous air pollutant (HAP), and 24.9 TPY, 12 month rolling average for aggregate HAPs to demonstrate that these facility-wide emissions limitations are enforceable as a practical matter, in accordance with the "potential to emit" definition in 40 Code of Federal Regulations (CFR) §70.2. In particular, the permit record should address and account for all HAP and VOC emissions and emitting activities from the facility and explain how the PTE limits in the permit are enforceable as a practical matter.

For further information, see Cash Creek Generation, LLC, Title V petition response Order, No. IV-2010-4 June 22, 2012; Hu Honua Bioenergy Facility Title V petition response Order, No. IX-2011-1, February 7, 2014; and Yuhuang Chemical Inc. Methanol Plant Title V petition response Order, No. VI-2015-03, August 31, 2016.

2. Source-wide conditions, Section 1 and Section 2. These sections of the permit include blanket individual and aggregate HAP facility-wide emissions limits of 9.9 TPY and 24.9 TPY, 12-month rolling average (respectively), and general emissions calculation requirements. Although the permit conditions state that the limits apply to all equipment at the facility, the draft permit does not address 1) how the limits relate to individual emissions units, types of units, and activities at the facility, 2) how the emissions shall be calculated (taking into account all units and activities), and 3) monitoring and recordkeeping requirements for units that do not calculate HAP emissions on a mass balance basis (such as combustion units and units relying on control equipment). To ensure these potential to emit limits are enforceable as practical matter, please specify this information in the permit and

Staff Report as appropriate, and address how emissions shall be determined or measured for assessing compliance with these limits. See the above referenced Title V permit petition responses for more information.

3. EUCARBONMOLD, EUADHESIVE, FGPAINT, and EUPULTRUSION include ton or pound per year VOC emission limits, 12 month rolling average. Although the permit conditions require recordkeeping and calculations to determine compliance with the limits, the permit does not specify the calculation methods. Please include emission calculation requirements in the permit and/or provide further explanation in the Staff Report as appropriate to ensure that the permit includes monitoring and recordkeeping, including calculations, sufficient to assure compliance with the emission limits, in accordance with 40 CFR §70.6(c)(1).
4. EUADHESIVE. The material limits include the “footnote 2” federally enforceable designation, but the only identified underlying applicable requirement is Rule 225, which is a state enforceable only requirement. Please verify whether these conditions should include a “footnote 1” or “footnote 2” designation, and update the underlying applicable requirements column as appropriate.
5. FGPAINT. The material limits table identifies EUPAINTLINE-2 as the subject equipment, but there is also an asterisk stating that the VOC content requirements apply per coating per line. Please clarify the VOC content limits as appropriate to address whether they apply to both EUPAINTLINE-1 and EUPAINTLINE-2, or only to EUPAINTLINE-2.
6. FGPAINT. EUPAINTLINE-1’s oxidizer requires a 92.5% capture efficiency, a 95% destruction efficiency, and a 0.5 second minimum retention time. Please provide information in the Staff Report addressing how the permit assures compliance with these conditions and revise the permit if necessary, in accordance with 40 CFR §70.6(c)(1).
7. FGPAINT, FGCAMPLAN. FGPAINT includes a minimum temperature of 1500°F, or the minimum temperature from the most recent acceptable stack test, for the oxidizer. However, FGCAMPLAN sets the Compliance Assurance Monitoring indicator range for the oxidizer at a minimum of 1400°F. Please provide justification in the Staff Report addressing how the 1400°F indicator provides a reasonable assurance of ongoing compliance with the VOC emission limit and control standards or update the indicator range, as appropriate, in accordance with 40 CFR §64.3(a)(2).
8. FGNSPSJJJJ. Please verify whether EUGENERATOR-2 is subject to the Reciprocating Internal Combustion Engines MACT, Subpart ZZZZ, in addition to NSPS, Subpart JJJJ, and include any additional applicable requirements in the permit, as appropriate.

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

Sent: Thursday, March 02, 2017 10:45 AM

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

Subject: 30 Day Public Comment - Plasan Initial ROP (P0374)

A 30-day public comment period will be initiated for a draft initial Renewable Operating Permit (ROP) number MI-ROP-P0374-20XX, for Plasan Carbon Composites and Plasan North America (State Registration Number: P0374), located in Walker, Kent County, Michigan. The public comment period begins on March 6, 2017 and will end on April 5, 2017.

The Public Notice, Initial 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), Field Operations Supervisor, DEQ.

Thanks,
Heidi

Heidi Hollenbach
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