From: Lim, YeChan

To: Karl, Matthew (EGLE)

Cc: Myott, Brad (EGLE); Orent, Kelly (EGLE); Damico, Genevieve

Subject: Meridian Brick - Michigan Plant Comments

Date: Tuesday, May 3, 2022 7:22:22 PM

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Hello,

Thank you for the opportunity to discuss my questions earlier today. Below you will find the comments that were discussed.

- In Section 6 (Monitoring/Recordkeeping) of EUCRUSHING, EUTRUCKTRAFFIC, EUSTORAGE, and EUPUG-90, it states that Method 22 visible emission observations will be conducted monthly and Method 9 observations will be conducted if any visible emissions are observed during the Method 22 observation. However, it is not clear what corrective actions will be conducted if visible emission are observed during the Method 9 observation. Please describe within the permit conditions or the off-permit plan (Abatement and Equipment Monitoring Program/Preventative Maintenance Program) what corrective actions must be taken after visible emissions are recorded with the Method 9 observation in order to ensure compliance with the opacity limits established in the permit.
- Condition III(1) of EUPUG-90 states that the emission unit shall not operate unless the associated baghouse collector is installed and operating properly. However, there is no operating ranges established within the permit or supporting documentation. Please indicate the operating ranges (temperature and pressure drop) for this baghouse within the permit conditions or the off-permit plan (Abatement and Equipment Monitoring Program/Preventative Maintenance Program) in order to ensure practical enforceability of the PM limit established in the permit and continued integrity of the baghouse.
- Please ensure that all off-permit plans are made available as part of the public record.

Please let me know if you have any further questions,

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