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**Cc:** [Damico, Genevieve](#); [Blathras, Constantine](#)  
**Subject:** EPA comments regarding 30 Day Public Comment Period - CWC Textron ROP Renewal (B1909)  
**Date:** Wednesday, October 24, 2018 12:05:01 PM  
**Attachments:** [image001.png](#)

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Below are EPA's comments regarding the draft ROP for CWC Textron (SRN B1909). If you have any questions or would like to discuss further, please let me know.

Thanks,  
Beth Valenziano  
Air and Radiation Division  
Air Permits Section  
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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP) renewal for CWC Textron (State Registration Number: B1909), located in Muskegon, 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. EU-POURING. Special Condition (SC) I includes 6 emission limits (lb/ton) for PM, PM10, PM2.5, CO, NOx, and VOC, with the underlying applicable requirements from a Permit to Install, pursuant to R 336.2804 and 40 CFR §52.21(d). The permit identifies SC VI.2 and SC VI.3 as the associated monitoring and testing for each of these emission limits. These monitoring requirements generally require the permittee to calculate and maintain records of 12 month rolling emission rates and to monitor and record the tons of metal melted, using several different averaging times. To ensure that the permit includes enforceable monitoring and recordkeeping sufficient to assure compliance with each emission limit in SC I, please identify the specific calculations, emission factors, and any additional monitoring parameters (including frequency and averaging of the monitored data) as necessary to determine compliance with each lb/ton limit. See 40 CFR §70.6(a)(3) and (c)(1).
2. EU-DUCTILE-IRON. SC I.2 and SC 1.3 include a 2.25 lb/hr PM limit and a 9.855 tpy PM limit. The permit identifies SC III.2, SC VI.3, SC VI.4, and SC VI.5 as the associated monitoring and testing. These monitoring requirements generally require a Preventative Maintenance Plan, monitoring of pressure drop across the dust collector, and non-certified visible emissions readings. To ensure that the permit includes enforceable monitoring and recordkeeping sufficient to assure compliance with these lb/hr and tpy limits, please provide additional justification in the Staff Report regarding the existing monitoring, or supplement the monitoring in the permit as necessary, in accordance with 40 CFR §70.6(a)(3) and (c)(1).

3. EU-DUCTILE-IRON. SC 1.5, SC 1.6, and SC 1.7 include fluorides limits of 1.40 milligrams per cubic meter (corrected to 70 degrees Fahrenheit and 29.92 inches), 0.263 lb. per hour, and 1.15 tpy. The permit identifies SC VI.1 as the associated monitoring and testing, which requires quarterly fluorspar feed rate monitoring and total fluorspar used per month. To ensure that the permit includes enforceable monitoring and recordkeeping sufficient to assure compliance with these mg/m<sup>3</sup>, lb/hr, and tpy limits, please provide additional justification in the Staff Report regarding the existing monitoring, or supplement the monitoring in the permit as necessary, in accordance with 40 CFR §70.6(a)(3) and (c)(1).
4. EU-WEST-CUPOLA-1, EU-MP-RBB, EU-ACS-SAND, and EU-SHAKEOUT. The control equipment indicator ranges for pollutant specific emission units (PSEUs) subject to Compliance Assurance Monitoring include wide ranges that can be typical when setting initial ranges prior to testing and subsequently establishing specific ranges that are indicative of compliance for a specific emission limit. Have the PSEUs been tested to verify the indicator ranges necessary to assure compliance with the associated particulate matter limits? Please address whether the indicator ranges in the permit for these CAM subject units have been verified, and consider whether additional requirements for testing and verification of the indicator ranges is appropriate, in accordance with 40 CFR §64.3(a)(2) and §64.4.
5. FG-MACT-ZZZZZ. This flexible group addresses the applicable requirements for 40 CFR Subpart ZZZZZ, Iron and Steel Foundries Area Sources. Please review the following MACT provisions as they apply to this source and revise the permit conditions as necessary to ensure that the permit includes all applicable requirements, in accordance with 40 CFR §70.6 and subpart ZZZZZ. As written in the draft permit, some of the underlying applicable requirements are incomplete or paraphrased.
  - a. EU-WEST-CUPOLA-1 is the only emission unit identified in FG-MACT-ZZZZZ. Please verify the emission units and activities subject to Subpart ZZZZZ and identify them in this flexible group, as applicable.
  - b. The pollution control equipment section of FG-MACT-ZZZZZ does not identify any of the dust collectors and baghouses
  - c. §63.10885 metallic scrap and mercury switches management
  - d. §63.10895(b) capture and collection system
  - e. §63.10896 operation and maintenance plan requirements
  - f. §63.10897(a)(1)(i) and (ii) PM control inspections (consider specifying instead of general reference to §63.10897(a))
  - g. §63.10897(a)(4)(i), (ii), and (iii) PM control inspections (consider specifying instead of general reference to §63.10897(a))
  - h. §63.10897(d) bag leak detection system monitoring (as applicable)
  - i. §63.10897(e) capture system monitoring
  - j. §63.10897(f) operation and maintenance plan requirements for monitoring
  - k. §63.10897(g) corrective action requirements
  - l. §63.10898(b) performance test frequency
  - m. §63.10898(b) performance test requirements (“in accordance with” provision is missing reference to §63.10898(d) through (g))

- n. §63.10898(i) performance test frequency
- o. §63.10898(j) performance test certification for capture system
- p. §63.10899(b)(1), (b)(2), and (b)(3) recordkeeping for scrap
- q. §63.10899(b)(9) bag leak detection recordkeeping (as applicable)
- r. §63.10899(b)(12) corrective action recordkeeping
- s. §63.10899(b)(13) inspection and maintenance recordkeeping for PM controls

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**Subject:** 30 Day Public Comment Period - CWC Textron ROP Renewal (B1909)

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B1909-20XX, for CWC Textron (State Registration Number: B1909), located in Muskegon, Muskegon County, Michigan. The public comment period begins on September 24, 2018 and will end on October 24, 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:

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<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 Eric Grinstern ([grinsterne@michigan.gov](mailto:grinsterne@michigan.gov)), Environmental Quality Specialist, DEQ, Grand Rapids District Office. Please copy Heidi Hollenbach ([hollenbachh@michigan.gov](mailto:hollenbachh@michigan.gov)), Grand Rapids District Supervisor, DEQ, Chris Ethridge ([ethridgec@michigan.gov](mailto:ethridgec@michigan.gov)), Field Operations Manager, DEQ, and Kelly Orent, ([orentk@michigan.gov](mailto:orentk@michigan.gov)), DEQ.

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