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To: [Brewer, Kathy \(EGLE\)](#); [Hare, Chris \(EGLE\)](#)
Cc: [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#); [Damico, Genevieve](#); [Blathras, Constantine](#); [Lim, YeChan](#)
Subject: DDP Specialty Electronic Materials - SRN P1027 - comments on draft permit MI-ROP-P1027-20XX
Date: Tuesday, September 8, 2020 5:38:01 PM

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Hi Kathy and Chris,

I have reviewed the draft ROP for DDP Specialty Electronic Materials, SRN P1027, permit number MI-ROP-P1027-20XX. My comments are included below.

1. The draft permit incorporates the following applicable requirements: 40 CFR Part 63 Subpart EEEE (OLD MACT) in FGOLDMACT, 40 CFR Part 63 Subpart FFFF (MON MACT) in FGMONMACT, and 40 CFR Part 63 Subpart HHHHH (Coatings MACT) in FGCOATINGSMACT. Recent revisions to the OLD MACT, MON MACT, and Coatings MACT have created several additional requirements that may apply to the source during the term of the permit once issued. However, it does not appear that applicability of the new requirements has been evaluated as part of this permit action. We request that you either evaluate the applicability of the new requirements added to the OLD MACT, MON MACT, and Coatings MACT and incorporate each requirement into the permit as necessary or provide justification explaining why applicability does not need to be evaluated as part of this action. The new requirements, compliance date for the new requirements, and the Federal Register Notice revising each standard is included below.
 - a. OLD MACT: 40 CFR 63.2342(e). See 85 FR 40740, available online at <https://www.govinfo.gov/content/pkg/FR-2020-07-07/pdf/2020-05900.pdf>, for more information.
 - b. MON MACT: 40 CFR 63.2445(g). See 85 FR 49084, available online at <https://www.govinfo.gov/content/pkg/FR-2020-08-12/pdf/2020-12776.pdf>, for further information.
 - c. Coatings MACT: 40 CFR 63.7995(e). See 85 FR 49724, available online at <https://www.govinfo.gov/content/pkg/FR-2020-08-14/pdf/2020-13439.pdf>, for more information.
2. EU94 condition I.1 is marked as a state-only enforceable requirement, citing R 336.1225 as its underlying applicable requirement. However, conditions IV.1, VI.1, and VI.2 are each marked as federally enforceable, making it unclear as to whether each requirement is appropriately designated as federally or state-only enforceable. We request that you verify whether each requirement applicable to EU94 is correctly designated as federally or state-only enforceable and provide appropriate justification of the designation in the record.

Please let me know if you have any questions.

Thanks,
Michael Langman
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