



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

MAR 29 2011

REPLY TO THE ATTENTION OF:

AR-18J

Mary Douglas
Supervisor
Kalamazoo District Office
Michigan Department Environmental Quality
7953 Adobe Road
Kalamazoo, Michigan 49009-5026

Dear Ms. Douglas:

The U.S. Environmental Protection Agency has the following comments on the Michigan Department of Environmental Quality's proposed renewal of the Renewable Operating Permit for Technisand, Incorporated, State Registration Number A0367.

1. ROP, FGRule331RawSand, III. Process/Operational Restrictions. Paragraph 3 includes a general statement, and references 40 CFR 64.7(d) as the underlying applicable requirement. In its entirety, 40 CFR 64.7(d) states:

(d) Response to excursions or exceedances. (1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

This requirement, as included in the permit, does not include all of these provisions. In addition, the permit should include any specific actions necessary during the excursion of the scrubber water flow rate. Also, the permit must address the specific actions necessary in regards to the control device, and not just the emissions units (the proposed permit condition

refers only to the emission unit).

2. ROP, Part E, Non-Applicable Requirements. The non-applicability justification for EU#2Dryer is insufficient. Any non-applicability determinations based on whether the source has been modified or reconstructed is limited to MDEQ's determination that specific changes made at a certain point in time were not modifications or reconstruction. The non-applicability determination for EU#2Dryer must either be removed or revised to provide a non-applicability analysis only for specific changes to the equipment.
3. Staff Report, Source-wide Permit to Install. No PTIs are listed here, but the Equivalent Requirements section of the Staff Report references PTI 142-89. In addition, the Regulatory Analysis section indicates that "Line #5 at the Resin plant was permitted." The PTI section of the staff report should list all PTIs, and the ROP should include all applicable PTI requirements.

Also, are there other PTIs in addition to 142-89 that should be identified? The ROP's emission unit summary table identifies installation/modifications dates of 1996, 1998, 1999, 2004, and 2010. 2010 might be exempt, as discussed in the staff report, but the other modifications are not addressed.

4. ROP, FGRule331RawSand. The Monitoring/Testing Method column in the Emission Limit table should reference the specific relevant requirements identified in subsections III, VI, and VII, and not General Condition 13.

Also, should EU#2Cooler and EU#2Dryer be listed together in the Emission Limit table, as they are both controlled by the cyclones and the web scrubber, and are subject to CAM? Should some of the other emissions units be listed separately in the table, so that the references to the Monitoring/Testing Methods are clear for each unit?

Similarly, should conditions III.3 and VI.2 refer to EU#2Dryer as well as EU#2Cooler?

5. ROP, FGMullers. The Monitoring/Testing Method column in the Emission Limit table for particulates should reference the specific relevant requirements identified in subsections V and VI, and not General Condition 13.
6. ROP, FGRule331Resin. The Monitoring/Testing Method column in the Emission Limit table should reference the specific relevant requirements identified in subsection VI, and not General Condition 13.
7. Please ensure that the source's current 40 CFR Part 64 Compliance Assurance Monitoring plan and Rule 371 fugitive dust plan are available on the Michigan Air Permit System ROP source documentation on the Internet.

Thank you for your consideration. If you have any questions or concerns regarding these comments, please contact Beth Valenziano of my staff at (312) 886-2703.

Sincerely,

A handwritten signature in black ink that reads "Pamela Blakley". The signature is written in a cursive, flowing style.

Pamela Blakley
Chief
Air Permits Section

cc: Matt Deskins, MDEQ Kalamazoo
Teresa Seidel, MDEQ Air Quality Division