



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 09 2016

REPLY TO THE ATTENTION OF

Christopher Ethridge  
District Supervisor  
Southeast Michigan District Office  
Michigan Department of Environmental Quality  
Air Quality Division  
27700 Donald Court  
Warren, Michigan 48092

Dear Mr. Ethridge,

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit for Warren Waste Water Treatment Plant (permit number MI-ROP-V1792-201X). To ensure that the source meets 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:

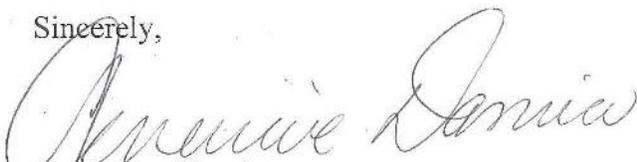
1. Condition III.6. for EUIncinerator on page 15 requires adequate water flow through the wet scrubbers at all times, however, it is unclear what flow rate is required. The permit should specify the minimum water flow rate for the scrubbers. The permit should also include monitoring and recordkeeping requirements for the water flow rate through the scrubbers. Please specify an operating water flow rate, monitoring and recordkeeping conditions in the permit.
2. Section V in EUIncinerator and EU Incinerator-NSPS-MMMM require mercury and beryllium emissions from the EUIncinerator shall be calculated once per month. Please specify calculation methods to determine both mercury and beryllium emissions.
3. Condition VI.5. for EUIncinerator on page 15 sets a maximum effluent pH from the chemical scrubber. This condition seems more like an operational restriction and would make more sense in section III for this emission unit. Consider relocating this condition to section III.
4. Condition IX.6. for EUIncinerator on page 17 requires that the oxidizing scrubber be operated as described in the permit application. Please include specific operating parameters in the permit.
5. Condition III.2 for EUIncinerator-NSPS-MMMM on page 20 requires VenturiPak wet scrubber differential pressure monitoring, however does not include the allowable

differential pressure range. Please specify the differential pressure requirement for the Ventruipak wet scrubber.

6. Condition IV.2. for EUBeltPress on page 26 requires that the pressure drop monitor for the activated carbon adsorption system be installed, calibrated, maintained, and operated in "a satisfactory manner." It is unclear from the permit what specifications constitute "satisfactory." The permittee should follow the recommendations of the vendor/system designer of the monitor to ensure proper installation, calibration, maintenance and operation. Please clarify the permit.
7. Condition IV.6. for EUBeltPress on page 26 requires the replacement of the ductwork air intake filters when they are "excessively dusty/dirty." It is unclear from the permit what constitutes "excessively dusty/dirty." Please clarify the permit.
8. Condition III.1. for EUWetWell on page 28 restricts the operation of the raw sewage wet well unless the oxidizing scrubber is "installed and installed properly." It is unclear from the permit constitutes "properly." The permittee should follow the recommendations of the vendor/system designer of the scrubber to ensure proper installation. Please clarify the permit.
9. Condition III.2. for EUWetWell on page 28 requires a liquid flow indicator for the oxidizing scrubber, however, it does not indicate what liquid flow rate is required for the scrubber. The permit should specify the minimum water flow rate for the oxidizing scrubber. The permit should also include monitoring and recordkeeping requirements for the liquid flow rate through the scrubber. Please specify an operating flow rate, monitoring and recordkeeping conditions in the permit.

We appreciate the opportunity to provide comment on this draft permit. If you have any questions, feel free to contact me or Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,



Genevieve Damico  
Chief  
Air Permits Section