



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

REPLY TO THE ATTENTION OF:

NOV 18 2015

Annette Switzer
Acting Permit Section Supervisor
Michigan Department of Environmental Quality
P.O. Box 30260
Lansing, Michigan 48909-7760

Dear Ms. Switzer:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft permit to install to be issued to The Andersons Inc. located in Sheridan Township, Michigan (permit number 144-15). On November 12, 2015, my staff held a conference call with your permit writing staff to discuss our concerns and comments on the draft permit. 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, the U.S. Environmental Protection Agency has the following comments:

1) On page 58 of the draft permit, the permit condition I. Emission limit for nitrogen oxides limits the source-wide FGFACILITY to 249.9 tons per year on a rolling 12-month time period. As stated in Federal guidance such as the June 13, 1989 EPA memo entitled, Guidance on Limiting Potential to Emit (PTE) in New Source Permitting "practically enforceable PTE limits should include production and/or operation limits in addition to emission limits. Emission limits alone are generally not practically enforceable for the purposes of limiting PTE unless there is a continuous monitoring system, or in certain cases where emissions can be accurately determined, for example, via mass balance calculations." It is not apparent in the draft permit how this condition is practically enforceable. As discussed during the conference call, additional emission units that are not listed in this draft PTI but are included in the operating permit (such as the emergency diesel generator), are process equipment subject to this source-wide limit. MDEQ should revise the draft permit to include the compliance method and record keeping requirements in the Process and Operational Restrictions (section III) that will be used to assure compliance with this synthetic minor limit, including all units which are subject to this facility wide emission limitation which is just below the major source permitting threshold.

2) The hammermills, cooling drum, and corn receiving and handling areas are controlled by various baghouses. The draft permit includes the requirement for a differential pressure

monitoring device on the baghouses. EPA asks that MDEQ consider the use of baghouse leak detection systems for baghouse compliance in addition to a differential pressure monitor and include a discussion in the permit record. The use of a differential pressure gauge alone is not a sufficient performance indicator to assure the proper operation of the baghouses. The use of a differential pressure gauge alone does not provide a reliable method of ensuring the integrity of the bags in the baghouse. For fabric filter control devices, EPA recommends performance indicators such as outlet particulate matter concentration, bag leak detectors, outlet opacity monitors, inlet temperature and temperature differential, exhaust gas flow rate, cleaning mechanism operation, fan current, and inspection and maintenance methods as possible options to assure the proper operation of fabric filter baghouses.

3) On pages 32 and 37, the draft permit has conditions that apply to the thermal oxidizers C-10 and C-10A, that the thermal oxidizer shall be capable of attaining a minimum volatile organic compound destruction efficiency of 98 percent by weight. The draft permit does not contain testing and monitoring/recordkeeping to demonstrate how the facility will assure compliance with the 98 percent limit. Please include appropriate testing and monitoring/recordkeeping required for the thermal oxidizers to achieve 98 percent destruction efficiency.

4) On pages 20, 24, 26, 35, 39, 44, 51, and 60 of the draft permit, there are references to particular appendices of the renewable operating permit (ROP) MI-ROP-B8750-2015. As discussed during the conference call, it would be clearer in the permit to include the particular language from each appendix, as appropriate, that pertains to the permit conditions being cited. The general reference to the ROP appendices on these pages does not add clarity to the draft permit terms.

5) As part of the FGPURGE group for the carbon dioxide (CO₂) capture from the fermenters, the draft permit states, "the exhaust from the first three hours or so of filling is not suitable for use at the CO₂ recovery facility..." The condition of *first three hours or so* is vague. Please explain the three hour timeframe and what conditions, which should be included in the draft permit, are necessary before the CO₂ is sent to the purge scrubber.

6) As discussed during our conference call, the special condition citations in the monitoring/testing method section for the emission limits for various emission units, reference pollutant testing methods that are not the pollutants listed in the emission limit conditions. Please verify the special condition references for all emission units to ensure that the condition is for the appropriate pollutant monitoring and testing method.

7) As part of the total plant fugitive emissions leak detection and repair program, the use of an infrared camera (optical gas imaging instrument) system may be appropriate to more accurately account for volatile organic compounds and hazardous air pollutants, which may be emitted from leaking valves, flanges, and piping components. The provisions of 40 CFR Part 60.18(g)-(i) and 63.11(c)-(e) allow for the alternative work practice, instead of a Method 21 monitor, and use of

such technology in assuring compliance with the permit. Please consider the infrared camera in this application and include a discussion in the permit record.

- 8) EPA has the following comments on typographical corrections in the draft permit:
- a) On page 6 of the draft permit, the term "DDGS" is not defined. However, the term is defined in the Fact Sheet. Please define this term in the draft permit.
 - b) On page 55, permit condition 6, the term FGNSPSKKKK is used but is not defined. Per our discussions, please correct this with the appropriate correct citation.
 - c) On page 55, permit condition 3(iv), the term "CFR" for Code of Federal Regulations is missing twice between the 40 and 75.19 references.
 - d) On page 52, in the Description section, the word "head" should be "heat".
 - e) On page 52, Section I Emission limits, condition 4, nitrogen oxides limit, per our discussions, we believe that the emission unit equipment this condition applies to should be EU-DB instead of FGCHP.

Thank you for working with us to assure that these issues are resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras at (312) 886-0671, or Sarah Rolfes at (312) 886-6551.

Sincerely,



Genevieve Damico
Chief
Air Permits Section