



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

APR 30 2013

REPLY TO THE ATTENTION OF:

Remilando Pinga
Department of Environmental Quality
Southeast Michigan District Office
27700 Donald Court
Warren, Michigan 48092-2793

Dear Mr. Pinga:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft initial renewable operating permit for Shelby Foam Systems (Permit Number MI-ROP-N7707-201X). To ensure that the source meets federal Clean Air Act requirements, that the permit provides necessary information so that 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) Shelby Foam Systems is subject to the National Emission Standards for Hazardous Air Pollutants for the flexible polyurethane foam production and fabrication industry, 40 Code of Federal Regulations (C.F.R.) Part 63, Subpart OOOOOO, and for stationary reciprocating internal combustion engines, 40 C.F.R. Part 63, Subpart ZZZZ. The draft permit contains detailed permit content for the Subpart ZZZZ standard. However, the draft permit contains only a general, higher level citation and no details regarding the requirements of Subpart OOOOOO that apply to the source. As Subpart OOOOOO is of particular applicability to this facility, MDEQ should include the detailed requirements of Subpart OOOOOO in this draft permit. The applicable Title V operating permit regulations at 40 C.F.R. § 70.6 require that a permit include emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. EPA's March 5, 1996 White Paper Number 2 for Improved Implementation of the Part 70 operating permits program provides clarifying guidance on steps to incorporating applicable regulations into a Title V permit.
- 2) Page 31 of the draft permit contains flexible group conditions to limit Hazardous Air Pollutants (HAP) individually and in aggregate to 9.5 and 24.5 tons per year, respectively. The associated monitoring and record keeping requirements do not specify the HAP emission calculation methodology used to assure compliance with the yearly HAP limits. The permit conditions require records of HAP content in materials used and reclaimed, but does not provide the method for determining HAP content emitted from

the associated processes. The monitoring and recordkeeping necessary to assure compliance with the limits should also take into account all emissions at the facility, including those emissions from finished product off-gases being stored within the facility. MDEQ should include adequate monitoring and recordkeeping in the permit which would provide the specific method for calculating the HAP emissions so the permit terms would be enforceable as a practical matter.

We would like to thank you again for working with us in making sure that these issues were resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the typed name.

Genevieve Damico
Chief
Air Permits Section