



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

REPLY TO THE ATTENTION OF:

MAY 24 2012

Andrew Stewart
Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

Dear Mr. Stewart:

The U.S. Environmental Protection Agency has the following comments on the Wisconsin Department of Natural Resources' (WDNR) draft of the Prevention of Significant Deterioration (PSD) Permit for Arrowcast, Inc. The draft permit is being proposed as a PSD permit (#11-POY-262) and a Title V permit revision (#459005910-P12). The permit is to allow increased casting production and the installation of three new sand silos, three new induction melting furnaces, new autopour systems and new cooling and screening equipment.

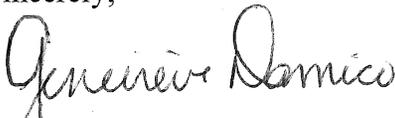
In order to ensure that the project meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments.

- 1) As of July 1, 2011, a source can be a major source for its greenhouse gas (GHG) emissions alone if the potential to emit (PTE) is 100,000 tons per year or greater of carbon dioxide-equivalent, thus being subject to PSD requirements. Please provide the GHG PTE and explain whether the source is a major source of GHGs.
- 2) The project proposed in draft permit 11-POY-262, is substantially related to the modifications authorized in permit 10-POY-244 and as such the emissions resulting from both projects should be considered to determine if the combined project emissions result in a significant emission increase. Permit application 10-POY-244 authorized modifications to the Phenolic Urethane Coldbox Core Production (P01, P02/S02), Phenolic Urethane No Bake Core Production and Core Room (P11/S06), Mold Release and Coating (P23/S23), and Rust Preventative Coating (P96/S96). These emission units appear to be related to the current PSD project, however these modifications are not included in the PSD analysis of the current permit. Why has WDNR not considered these modifications in the PSD analysis for the current PSD permit?

- 3) The language in condition I.A'.2.a(8) reads "Core coatings may not contain more than 60%, by weight, as applied for all core coatings." It appears that the condition should read "Core coatings may not contain more than 60% Volatile Organic Compounds (VOC), by weight, as applied for all core coatings." If appropriate please add "VOC" to the condition to improve clarity.
- 4) Condition I.B'5.b.(2) reads, "The permittee shall comply with" and does not contain any requirements. It appears that either a limitation was left out or this permit condition was included in error. For clarity please either add the necessary limitation or remove condition I.B'5.b.(2).
- 5) The permit contains a label for Condition I.D'.1.a.(2), however there is no condition listed for this label. For clarity please insert the necessary condition or remove the labeling.
- 6) Condition I.D'.1.b.(1) references permit conditions I.D'.1.a.(2) and (4), however these conditions do not exist in this permit. For clarity please correct this reference or add necessary conditions.
- 7) Several discrepancies between the limits elected by the source as listed in the Analysis and Preliminary Determination document and as recorded in the draft permit were found. Please explain the difference between the limits in the Analysis and Preliminary Determination document and draft permit or replace the incorrect values with the intended value so the permit and the Analysis and Preliminary Determination document read the same. The discrepancies found are as follows:
 - a. Condition I.G'. 1 .a.(1)(a) of the draft permit records the Particulate Matter (PM) emission limit for Plant 1 Pouring and Cooling (P39) as "2.25 pounds per hour" whereas page 36 of the Analysis and Preliminary Determination document provides the PM emission limit for P39 as "3.95 pounds per hour".
 - b. Condition I. G'.5 .a.(1)(a) of the draft permit records the Particulate Matter 2.5 Microns or Less (PM_{2.5}) emission limit for P39 as "1.9 pounds per hour" whereas page 37 of the Analysis and Preliminary Determination document provides the PM_{2.5} emission limit for P39 as "3.4 pounds per hour".

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Andrea Morgan, of my staff, at (312) 353-6058.

Sincerely,



Genevieve Damico
Chief
Air Permits Section