



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

NOV 06 2012

Ed Lancaster  
Michigan Department of Environmental Quality  
Air Quality Division - Jackson District Office  
301 East Louis Glick Highway  
Jackson, Michigan 49201

REPLY TO THE ATTENTION OF:

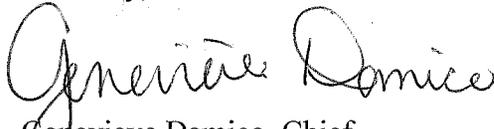
Dear Mr. Lancaster,

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP), Permit Number MI-ROP-B1754-2012, for the Ervin Amasteel Division facility located in Adrian, Michigan. 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, EPA has the following comment:

Numerous monitoring/testing method references in the emission limits tables throughout the draft permit refer to General Condition 13 instead of identifying the specific methods for determining compliance with emission limits. General Condition 13 provides that the Michigan Department of Environmental Quality may require performance tests. It does not address any specific monitoring requirements required by the underlying applicable requirements, nor does it address the periodic monitoring or sufficiency monitoring requirements of 40 CFR 70.6(a)(3)(B) and 70.6(c)(1), respectively. Please ensure that the permit accurately references the associated monitoring/testing methods for each of these limits, and that the permit includes adequate monitoring, recordkeeping, and reporting as required by the underlying applicable requirements and the Part 70 regulations.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Beau Garrett, of my staff, at (312) 353-4824.

Sincerely,

  
Genevieve Damico, Chief  
Air Permits Section

cc: Teresa Seidel, MDEQ Field Operations Supervisor  
Scott Miller, MDEQ Jackson District Supervisor