



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

MAR 23 2015

REPLY TO THE ATTENTION OF:

Janis Ransom
Cadillac/Gaylord District Supervisor
Air Quality Division
Michigan Department of Environmental Quality
120 West Chapin Street
Cadillac, Michigan 49601-2158

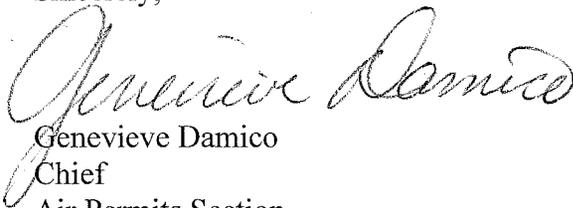
Dear Ms. Ransom:

The U.S. Environmental Protection Agency has reviewed the draft renewal of the Renewable Operating Permit (ROP) for Montmorency-Oscoda-Alpena Solid Waste Management Authority, State Registration Number N8248, located in Montmorency County, 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:

The emission unit conditions for EUASBESTOS, Section III.1.a., Section III.1.c, and Section III.1.d. include several options pertaining to visible emissions, requirements for covering asbestos-containing material, and alternative emissions control methods, respectively, in accordance with 40 Code of Federal Regulations Part 61, Subpart M. However, there are no associated monitoring/recordkeeping requirements to either 1) determine which option the source is using, or 2) assure compliance with each specific option. Please revise the draft permit to include monitoring requirements sufficient to assure compliance with these permit terms and conditions, in accordance with 40 Code of Federal Regulations §70.6(c)(1).

Thank you for the opportunity to provide comments on this draft permit. If you have any questions, please contact me or Beth Valenziano, of my staff, at (312) 886-2703.

Sincerely,


Genevieve Damico
Chief
Air Permits Section