



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

NOV 06 2012

REPLY TO THE ATTENTION OF:

Mary Ann Dolehanty
Permit Section Supervisor
Air Quality Division
Michigan Department of Environmental Quality
P.O. Box 30260
Lansing, Michigan 48909

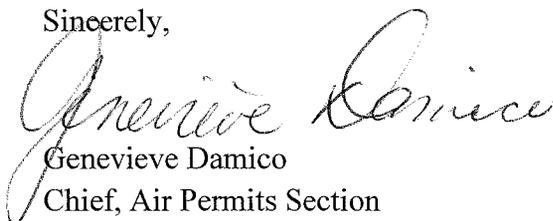
Dear Ms. Dolehanty:

The U.S. Environmental Protection Agency has reviewed the draft Permit to Install for Waterfront Petroleum Terminal Company, application number 67-12, located in Detroit, 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:

1. The special conditions for FGFACILITY include emission limits for Volatile Organic Compounds (VOC), individual Hazardous Air Pollutants (HAP), and aggregate HAP. The Section VI. Monitoring/Recordkeeping requirements for these limits do not specify how to calculate the VOC and HAP emission rates. Please explain how the source will demonstrate compliance with the VOC, individual HAP, and aggregate HAP emission limits, in accordance with the practical enforceability permitting requirements in Michigan Rule 336.1205(1)(a). In addition, please ensure that the monitoring, recordkeeping, and reporting requirements for FGFACILITY are sufficient to demonstrate compliance with these emission limits. After talking with your staff, it is our understanding that the material throughput limits in the FG_Transfers section of the permit may be sufficient to demonstrate compliance with these emission limits; this may be one possible approach.

We appreciate 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

cc: Paul Schleusener, Michigan Department of Environmental Quality