



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

REPLY TO THE ATTENTION OF:

JUL 29 2015

Chris Hare
Upper Peninsula Acting District Supervisor
Saginaw Bay District
Michigan Department of Environmental Quality
401 Ketchum Street, Suite B
Bay City, Michigan 48708-5430

Dear Mr. Hare:

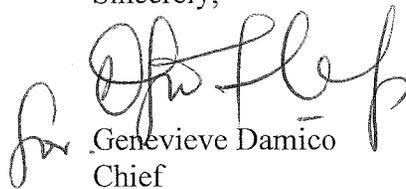
The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (MI-ROP-B4885-2015), for Tilden Mining Company, L.C., located in Ishpeming, Michigan 49849. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information 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 comments:

- 1) Please clarify in the Staff Report whether or not the Empire mine and Tilden Mining Company are considered to be a single major stationary source for both Prevention of Significant Deterioration (PSD) and Title V permitting requirements. A fact sheet, dated November 1, 2010 and entitled "Fact Sheet, Public Participation Document for Michigan Iron Nugget LLC," published by the Michigan Department of Natural Resources and Environment, for the proposed Permit To Install (PTI) 88-10 permit, states that "from a regulatory perspective, Tilden and Empire [Mining] are considered to be a single stationary source" under both PSD and Title V. Conversations with MDEQ staff seem to confirm that Empire and Tilden Mining are treated as a single source for construction permitting. However, the Staff Report does not mention the two entities as a single source for regulatory purposes.
- 2) Renewable Operating Permit, Staff Report, page 5. The Staff Report fails to include a list of all PTIs that have been previously incorporated into the ROP. Please include a list of all previously incorporated PTIs for the source in the Staff Report. Since the source seems to include Empire Mining and Tilden Mining, please include PTIs for both entities in the Staff Report. If source-wide or project-related restrictions were taken to avoid PSD applicability, please also include a discussion in the Staff Report.

- 3) Renewable Operating Permit Staff Report, page 4. The Staff Report fails to include emissions data for all criteria pollutants. Please include emissions data for PM₁₀ and PM_{2.5} in the Staff Report.
- 4) Renewable Operating Permit, Staff Report, page 5. The Staff Report states that dryers 1 and 2, kilns 1-2, FG dust collectors and FG taconite Maximum Achievable Control Technology (MACT) group are exempt from Part 64 Compliance Assurance Monitoring (CAM) requirements for particulate matter because “particulate matter emission limitations are addressed by the National Emission Standard for Hazardous Air Pollutants: Taconite Iron Ore Processing promulgated in 40 CFR Part 63, Subparts A and RRRRR.” For units subject to both exempt and non-exempt emission limitations or standards, Part 64 still applies to the unit. Please consider whether any units may be subject to the MACT and Part 64. If so, clarify in the Staff Report, discuss MACT and CAM applicability, and include a CAM Plan in the ROP as necessary.
- 5) Renewable Operating Permit, page 29. The draft permit states that Emission Unit Boiler 3 is subject to the requirements of 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. However, the permit does not include details of specific conditions/requirements of the MACT for which Boiler 3 is subject. Noting that the compliance date for this MACT has not yet occurred, if the source has determined how it will comply, please consider including, at this time, specific applicable MACT emission limits, process/operational restrictions, testing/sampling, monitoring/recordkeeping and reporting requirements for this emission unit. If the source has not yet chosen a compliance method, please include a discussion in the Staff Report of how/when the details of the MACT will be incorporated into the ROP.
- 6) Renewable Operating Permit, page 47. The draft permit states that Emission Units Boiler 1-2 (FG Boilers 1-2) are subject to the requirements of 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. However, the permit does not include details of specific conditions/requirements of the MACT to which FG Boilers 1-2 are subject. Noting that the compliance date for this MACT has not yet occurred, if the source has determined how it will comply, please consider including at this time specific applicable MACT emission limits, process/operational restrictions, testing/sampling, monitoring/recordkeeping and reporting requirements for this emission unit. If the source has not yet chosen a compliance method, please include a discussion in the Staff Report of how/when the details of the MACT will be incorporated into the ROP.

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 Jennifer Darrow, of my staff, at (312) 886-6315.

Sincerely,

A handwritten signature in cursive script, appearing to read "Genevieve Damico". The signature is written in black ink and is positioned to the left of the printed name.

Genevieve Damico
Chief
Air Permits Section