



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

DEC 23 2015

REPLY TO THE ATTENTION OF:

Rachel Yucius
Air Quality Permits, Unit 1
Industrial Division
Minnesota Pollution Control Agency
522 Lafayette Road North
St. Paul, Minnesota 55155

Dear Ms. Yucius:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (Permit #06500002-002), for Imperial Plastics, located in Mora, Minnesota 55051. 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) Table 3 of the technical support document (TSD), lists the total facility limited potential emissions of PM₁₀ and PM_{2.5} as 201 tons per year (tpy) each. However, permit #06500002-002 appears to limit emission of PM₁₀ and PM_{2.5} to 225 tpy from group COMG4 (p.12-13, TSD). Please clarify or correct the TSD to reflect the facility limited potential emissions of PM₁₀ and PM_{2.5}.
- 2) Section 2.1 of the TSD also cites a total facility potential to emit (PTE) of 200 tpy of PM₁₀ and PM_{2.5} at group COMG4. The limit in the permit is 225 tpy from group COMG4. Please correct the TSD to reflect the facility limited potential emissions of PM₁₀ and PM_{2.5}.
- 3) Section 2.4 of the TSD states that "the facility took limits in 2015 to be categorized as an area source of HAPs for any future standards." The TSD fails to explain further how/where this was done. Moreover, this does not appear to have been done with a permit action – the last permit issued to this facility is a total facility permit issued in 2001. Please explain how/where the facility's HAPs were limited in 2015.
- 4) In order for the facility to avoid applicability with a MACT standard, they must have an enforceable restriction in place prior to the compliance date of the standard. Section 2.4 of the TSD also states that "the facility is subject to 40 CFR part 63 by accepting a limit to avoid major source status for HAPs. The re-designation of the facility as an area source of HAPs is effective upon permit issuance." Section 2.4 of the TSD goes on to state "the facility is not subject to 40 CFR part 63, subpart DDDDD, since the facility accepted limits on HAPs prior to the compliance date of January 31, 2016." Unless enforceable restrictions have been taken in a previously issued permit, this statement assumes that this permit, and its restrictions on HAPs, will be issued by January 31, 2016. Please explain if/where enforceable restrictions were taken to limit PTE of HAPs to below major source thresholds for 40 CFR part 63, subpart DDDDD.

- 5) Page 33 of the draft permit requires the Permittee to submit a CAM plan for group COMG7 within 180 calendar days after permit issuance. Since a CAM plan was due in 2006, 180 days to submit one seems like an excessive amount of time to give the Permittee to come into compliance with this requirement. Please revise the permit to require the CAM plan be submitted within 30 days of permit issuance.
- 6) Once the CAM plan is submitted and reviewed by MPCA, the elements of the plan need to be incorporated into the Title V permit. However, neither the draft permit nor the TSD explain how this will be performed. In addition, the draft permit does not specify the timeframe by which this should occur. Please explain, in terms of the permit process, how the elements of the CAM plan will be incorporated into the facility's Title V permit and revise the permit to specify details of the process for including permit conditions to address the compliance schedule.

The following comment is typographical in nature:

- 7) Page 3 of the TSD incorrectly cites 40 CFR Section 62.2 as the statutory authority for limiting HAP emissions. The correct statutory authority is 63.2. Please correct this error.

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,



Genevieve Damico
Chief
Air Permits Section