



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

MAR 12 2015

REPLY TO THE ATTENTION OF:

Ms. Kristin Hart
Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

Dear Ms. Hart:

The U.S. Environmental Protection Agency has the following comments on the Wisconsin Department of Natural Resources' (WDNR) draft renewal of the Title V operating permit for Waupaca Foundry, Inc. Plant 1 (#4690333730-P10). In order to ensure that the project meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for 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:

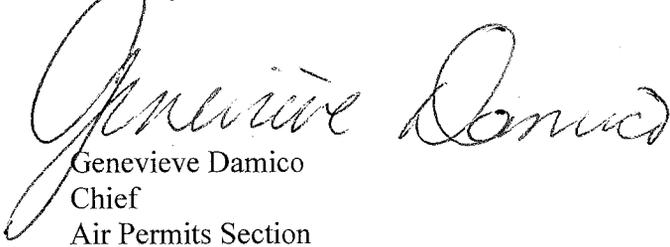
1. Preventative maintenance activities are required for the cupola and capture and collection on a daily, weekly, and monthly basis in permit conditions I.A.8.b(4) and I.A.8.b(5) on page 17 of the draft permit. The permit does not include recordkeeping requirements associated with these inspections. The permit should require that the facility maintain records of the results of inspections and record any corrective actions that are performed.
2. EPA noted multiple instances in the draft permit where the facility is required to keep a record of an emission factor, but the emission factor itself is not included in the permit. In order to provide transparency and make the information accessible to the public, EPA believes that the emission factor should be publically available.¹ EPA identified instances of unspecified emission factors in the draft permit in the following conditions: I.C.2.c.(2)(a), I.D.2.c.(2)(a), I.D.4.c.(2)(a), I.F.4.c.(2)(a), I.F.5.c.(2)(a), I.3.c.(2)(a), I.L.2.c.(2)(a), I.L.3.c.(3)(a), I.L.6.c.(2)(a), I.L.7.c.(2)(a), I.O.4.c.(2)(a), I.O.5.c.(2)(a). In each case where an emission factor is relied upon to demonstrate compliance, please revise the permit to include either the emission factor or include an explicit method for determining the emission factor.
3. The permit requires that the permittee meet a lead emission limitation of 0.0576 pounds per hour on page 16, condition I.A.6.(a)(1). Records are required for the amount of metal processed, but the permit doesn't provide the methodology or emission factor used to determine if the hourly emissions limit is exceeded. As discussed in Comment 2 above, the methodology and emission factor used to determine compliance should be explicitly identified in the permit.

¹ See In the Matter of United States Steel Corporation – Granite City, Permit No. 96030056 (Order on Petition) at 9-12 (December 3, 2012) http://www.epa.gov/region7/air/title5/petitiondb/petitions/uss_2nd_response2009.pdf

4. The permit includes hourly throughput limits for Line 5 Pouring/Mold Cooling (page 41 Conditions I.F.4.a(2) and I.F.5.4.a(2), and page 42, Condition I.F.6.a.(2)), however the recordkeeping requirements are only in terms of throughput of metal per day. Please justify why a daily recordkeeping requirement is sufficient to demonstrate compliance with an hourly throughput limit or if necessary, add an hourly throughput recordkeeping requirement.
5. Please determine if the cooling lines and shakeout lines meet the definition of "Automated conveyor and pallet cooling line" or "Automated shakeout line" pursuant to 40 CFR 63.7765. If either the cooling lines or shakeout lines are considered to be automated conveyor and pallet cooling lines or automated shakeout lines under the 40 CFR 63 Subpart EEEEE, please add the associated Subpart EEEEE requirements.
6. In condition I.O.5.(1)(b), the sand cooler is limited to burning only natural gas. The recordkeeping for the sand cooler requires the facility to maintain "documentation of the fuels this process is physically capable of combusting" (Condition I.O.5.c.(2)(a)). It is unclear from the permit and preliminary determination document if the sand cooler is only capable of combusting natural gas. If the cooler is capable of combusting fuels other than natural gas, the more appropriate compliance determination method would be to keep records of the fuels the sand cooler did burn. If the sand cooler is not capable of combusting fuels other than natural gas, it should be clarified in the permit record that the unit is only physically capable of burning natural gas.
7. The following may be typographical errors in the permit. If appropriate please make the necessary corrections.
 - a. On page 43 of the draft permit, condition I.F.8.b.(1) cites to paragraph AAA.3.a.(b)(6), should this citation read I.AA.2.a(1)(b)(6)?
 - b. On page 86 of the draft permit, condition I.AAA.2.a.(1)(c)(1) cites to paragraph (c)(1)(i) of this section, however paragraph (c)(1)(i) does not appear to exist.
 - c. On page 90 of the draft permit, condition I.AAA.6.a.(1)(c) cites to paragraphs (c)(1) through (5) of this section, however the last paragraph in the section is paragraph (3).
 - d. Condition I.H.2.b.(5) states that "The permittee shall measure and record the scrubber liquor flow...". Please correct to liquid flow.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Andrea Morgan, of my staff, at (312) 353-6058.

Sincerely,


Genevieve Damico
Chief
Air Permits Section