



Offhand

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

JUN 15 1995

REPLY TO THE ATTENTION OF:
(AT-18J)

Mr. Dale Ziege, P.E.
Bureau of Air Management
State of Wisconsin
Department of Natural Resources
101 South Webster Street
Box 7921
Madison, Wisconsin 53707

Dear Mr. Ziege:

I am writing to follow up with your telephone conversation on June 12, 1995, with Constantine Blathras concerning the Maysteel Corporation Federally Enforceable State Operating Permit (FESOP). This is to reiterate our concerns with the Particulate Matter limit in the final permit.

This source is subject to 40 CFR 60.310 Subpart EE, Standards of Performance for Surface Coating of Metal Furniture of the New Source Performance Standards, since it exceeds a coating usage of 3,842 liters per year. Since this source exceeds this limit, it is subject to the NSPS requirements of a major stationary source threshold limit of 100 tpy for any pollutant under the Title V operating permit requirements of 40 CFR Part 70.2 (1) and 40 CFR Part 70.2 (2) (xxvii).

To limit the potential to emit below the major source threshold, Maysteel must have federally enforceable emission limits of less than 100 tpy for each pollutant. Although the draft permit contained a particulate matter emission limit of 1.24 lbs/hr (5.43 tpy), the final permit contained a limit of 32.66 lb/hr (143 tpy). This limit exceeds the 100 tpy major source thresholds.

We recognize that we are commenting after the permit was issued. This is due to no public comment period being given for the final permit after the change. As it stands, the final permit limits warrant the source to obtain a Title V permit. If a change is not made, the FESOP permit would be considered not federally enforceable, because it does not limit emissions to less than 100 tpy.

If you have any further questions regarding this letter or would like to discuss this matter further, please contact Laura Gire at (312) 886-5031 or Constantine Blathras at (312) 886-0671 of my staff.

Sincerely yours,

Robert Miller

Robert Miller, Chief
Permits and Grants Section

