



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

APR 16 2015

Cindy Smith
Acting Permit Section Supervisor
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909-7760

REPLY TO THE ATTENTION OF:

Dear Ms. Smith:

The U.S. Environmental Protection Agency has reviewed the Permit to Install, number 130-12A, for Plasan Carbon Composites, located in Walker, 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.

FG-FACILITY includes facility wide emission limits for volatile organic compounds of less than 100 tons per year, individual hazardous air pollutants (HAPs) of less than 10 tons per year, and aggregate HAPs of less than 25 tons per year, pursuant to Rule 205(1). These limits are intended to limit the source's potential to emit to less than major source thresholds. EPA does not find limits set in a less than the major source threshold format enforceable as a practical matter. The upper bound of the limit should account for any inaccuracies in the required compliance measures, and for any small or insignificant activities (e.g., natural gas fired boilers, ovens) that may also contribute to facility emissions but are not specifically included in the compliance measures associated with the limit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please contact me or Rachel Rineheart, of my staff, at (312) 886-7017.

Sincerely,


Genevieve Damico
Chief
Air Permits Section