Message

From: Dykes, Teresa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C904D32B6A845D09D8F814C2F6509A0-TDYKES]
Sent: 9/21/2018 8:51:25 PM
To: Ogulei, David [Ogulei.David@epa.gov]
Subject: FW: MM2A example- Winpak (Illinois)
Attachments: 14040006 - Winpak_3 (2018-0504).doc

David- Do you know if the permit attached was revised based on your comments? If so, do you have a copy, or know where I can get one? Thanks

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From: Dalcher, Debra
Sent: Wednesday, May 16, 2018 11:53 AM
To: Ayres, Sara <Ayres.Sara@epa.gov>; Dykes, Teresa <Dykes.Teresa@epa.gov>
Subject: FW: MM2A example- Winpak (Illinois)

Just FYI. Note the email below also.

Debra

From: Valenziano, Beth
Sent: Wednesday, May 16, 2018 10:33 AM
To: Dalcher, Debra <dalcher.debra@epa.gov>; Castro, Grecia <Castro.Grecia@epa.gov>
Cc: Damico, Genevieve <damico.genevieve@epa.gov>
Subject: MM2A example- Winpak (Illinois)

Debra and Grecia,
Here's the latest (draft) MM2A request we are aware of.
-Beth

From: Ogulei, David
Sent: Wednesday, May 16, 2018 9:20 AM
To: Valenziano, Beth <valenziano.beth@epa.gov>
Cc: Marcus, Danny <marcus.danny@epa.gov>
Subject: FW: Winpak

This source is currently subject to NESHAP Subpart KK (Printing Press) and they are seeking to take advantage of the MM2A policy. Their request is included in their comments on the attached preliminary draft permit. Read below for my initial thoughts that I just transmitted to IEPA.

David

From: Ogulei, David
Sent: Wednesday, May 16, 2018 9:15 AM
To: 'Schnepp, Jason' <Jason.Schnepp@Illinois.gov>
Cc: Marcus, Danny <marcus.danny@epa.gov>; Romaine, Chris <Chris.Romaine@Illinois.gov>
Subject: RE: Winpak

Thanks, Jason. One piece of information that we have historically asked for whenever such limits are being established (primarily in FESOPs) is documentation of historical actual HAP emissions (including identification of the HAP emitted in the greatest amount) and the emissions calculation methodology that has historically been used. For example, the standard template for the FESOP Project Summary now includes a table that identifies "Actual and Potential (as limited by permit) Emissions of the Source". Actual emissions are reported for the last 3 years. The magnitude of the historical actual emissions reported by the facility helps inform the adequacy of the proposed monitoring/compliance methodology for the proposed emission limits. I hope you can consider requesting Winpak to submit similar information (if it hasn't already provided it) for the purpose of determining whether it can comply with any HAP PTE limits that are ultimately included in the revised permit.

The HAP limits proposed by Winpak (i.e., emissions "shall not exceed 10.0 tons/year of any single HAP and 25 tons/year of any combination of such HAPs"), without appropriate monthly and operational requirements, would not be practically enforceable as written. Also, for synthetic minor HAP limits, as proposed below, we really want to be clear about the specific monitoring methodology that would be used to demonstrate compliance with such limits, especially for the dominant HAP(s). In certain cases, depending on the magnitude of historical actual emissions relative to the proposed limits, periodic HAP content testing and/or stack testing, as appropriate, may be necessary. If a material balance will be used, it is appropriate to specify whether the applicant is allowed to account for capture and destruction, and how the associated capture and destruction efficiencies will be determined.

Currently, draft Condition 9(e) states: "To demonstrate that the source is an area source of Hazardous Air Pollutants (HAPs), the Permittee shall maintain a file or other record that contains the individual and combined HAP emissions from the source with supporting documentation and calculations." We recommend that this provision be strengthened as specified above. For example, if a material balance is the expected compliance methodology, it would be appropriate to include an equation in the revised permit that specifies whether capture and destruction can be considered in the HAP emissions calculation.

Let me know if you would like to discuss this further.

David

From: Schnepp, Jason [mailto:Jason.Schnepp@Illinois.gov]
Sent: Wednesday, May 16, 2018 7:20 AM
To: Ogulei, David <Ogulei.David@epa.gov>
Cc: Marcus, Danny <marcus.danny@epa.gov>; Romaine, Chris <Chris.Romaine@Illinois.gov>
Subject: RE: Winpak

David,
Attached is Winpak's request – it came in the form of comments to a revised draft permit.

I don't have a revised draft ready to share but I can tell you that we expect to have enforceable limits for HAP emissions. It would look something like this:

6c. HAP usage and HAP emissions of the affected units shall not exceed the following limits:

i. Limits for individual HAPs:

Individual HAP Usage		Individual HAP Emissions	
Tons/Month	Tons/Year	Tons/Month	Tons/Year
40	400	0.8	8.0

ii. Limits for all HAPs, combined:

Combined HAP Usage		Combined HAP Emissions	
Tons/Month	Tons/Year	Tons/Month	Tons/Year
100	1,000	2.0	20.0

Thanks,
Jason

From: Ogulei, David <Ogulei.David@epa.gov>
Sent: Tuesday, May 15, 2018 4:52 PM
To: Schnepp, Jason <Jason.Schnepp@Illinois.gov>
Cc: Marcus, Danny <marcus.danny@epa.gov>
Subject: [External] Winpak

Jason,

We are collecting information on requests for synthetic minor HAP limits from facilities that are attempting to take advantage of EPA's 2018 Major MACT to Area (MM2A) Policy. Based on our discussion earlier today, it appears Winpak is one of those facilities though I understand you are still reviewing the request. When you are able, can you share Winpak's request and the revised preliminary draft permit (if available)?

Thanks!

David

From: Schnepp, Jason [mailto:Jason.Schnepp@Illinois.gov]
Sent: Wednesday, April 18, 2018 10:33 AM
To: Ogulei, David <Ogulei.David@epa.gov>
Cc: Marcus, Danny <marcus.danny@epa.gov>; Romaine, Chris <Chris.Romaine@Illinois.gov>; Carter, Sally <Sally.Carter@Illinois.gov>
Subject: RE: 14040006 - Winpak_5.doc

Not that I am aware of.

From: Ogulei, David <Ogulei.David@epa.gov>
Sent: Wednesday, April 18, 2018 10:14 AM
To: Schnepp, Jason <Jason.Schnepp@Illinois.gov>
Cc: Marcus, Danny <marcus.danny@epa.gov>
Subject: [External] RE: 14040006 - Winpak_5.doc

Thanks Jason. Do you know if USEPA enforcement is/was a party to the enforcement negotiations for this source?

From: Schnepp, Jason [mailto:Jason.Schnepp@Illinois.gov]
Sent: Wednesday, April 18, 2018 8:18 AM
To: Ogulei, David <Ogulei.David@epa.gov>; Marcus, Danny <marcus.danny@epa.gov>
Subject: 14040006 - Winpak_5.doc

As discussed, here is an advanced copy of the Winpak draft.

Thanks,
Jason

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