From: Marcus, Danny
To: bruce.beazly@illinois.gov; Reed, Michael
Cc: Damico, Genevieve
Subject: Meyer Steel Drum, Inc. CAAPP permit 95120079
Date: Wednesday, August 21, 2013 5:15:00 PM

Bruce,
In follow up to our discussion, I wanted to provide you with a summary of the comments I discussed with you.

1. Conditions 4.1.1, 4.2.1, and 4.3.1 include a description of the emissions units, construction date, air pollution control devices, etc. The questions are whether these tables are enforceable? The emission units appear to rely on some of these control devices to demonstrate compliance with the applicable requirements. The monitoring for the respective conditions and emission units include requirements associated with use of the control equipment. For example, condition 4.2.2.c.i. restricts VOM emissions from the Drum Reclamation Furnace. Condition 4.2.2.c.ii. requires monitoring that consists of specified usage of the Afterburner. However, besides the description within the tables, it is not clear that the Afterburner is required to be used at all times (in order to comply with the applicable requirements). Similarly, the comment applies to the filters/RTO in Section 4.1 for the Coating Lines, and the filters in Section 4.3 for the Drum Reclamation Furnace.
    a. The permit lists a statement on page 17 that explains that the RTO is used for control of odors and that it is not meant for the control device to be enforceable within the permit for other criteria pollutants/HAPs. However, it appears that the permit requires the usage of Spray Booth filters and Afterburner for the Spray Booths/Shot Blasters and the Drum Reclamation Furnace, hence the need for clarification on the comment above. Additionally, it is not clear how the facility will demonstrate compliance with the applicable limitations with usage of these control mechanisms. For example, the facility will comply with an applicable PM SIP limitation in condition 4.1.2.b.i. by usage of filters and monitoring methods consisting of replacing the filters every 6 months along with inspections quarterly. How will the usage of these filters result in compliance with the applicable PM limits. Can the source assure they are in compliance with the applicable PM limits after 5 months and 20 days of filter usage? Is there records of PM emission factors from the manufacturers associated with usage of the filters? Similarly, the comment applies to condition 4.2.2.c (Enclosure/Afterburner controlling VOM for the Drum Reclamation Furnace) along with condition 4.3.2.b (Filters controlling PM from the Shot Blasters).
2. Construction permit 91040073 establishes enforceable limits of PM, NOx, and VOM for the Drum Reclamation Furnace. On page 34 of the permit, the permit references construction permit 91040073 and incorporates restrictions of PM (6.6 lb/hr and 9.9 tons/year) and VOM (5.0 lbs/hr and 7.5 tons/yr).

a. These limits are not consistent with the construction permit. The actual construction permit from June 10, 1991 establishes the limits of PM at .84 lb/hr and 1.3 ton/yr, and VOM at .84 lb/hr and 1.3 ton/yr.
b. Additionally, Section 4.2 appears to be missing the restriction established in construction permit 91040073 for NOx of 1.43 lb/hr and 2.1 ton/yr.

I look forward to your response/discussion on the comments above. In the meantime, I will let you know if there are other concerns and will contact you prior to the end of the comment period. Thanks.

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