



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

APR 12 2013

REPLY TO THE ATTENTION OF:

Bryant Esch
Environmental Coordinator
Thyssenkrupp Waupaca, Inc. – Plant 1
406 North Division Street
Waupaca, Wisconsin 54926

Re: Request for Alternative NSPS Monitoring Method for Plant 1 Process P40 – Sand Cooler Waupaca Foundry, Inc.

Dear Mr. Esch:

The purpose of this letter is to respond to the February 19, 2013, letter the U.S. Environmental Protection Agency received from Mr. Steve Klafka, Wingra Engineering, S.C., requesting the use of a Bag Leak Detection (BLD) system to monitor particulate matter emissions from a new sand cooler, P40 – Sand Cooler (P40), being installed at Thyssenkrupp Waupaca's Plant 1 foundry (Plant 1) at 406 North Division Street in Waupaca, Wisconsin.

Mr. Klafka's letter states that Plant 1 is a major source, subject to, among other things, Clean Air Act Title V permitting requirements and the National Emissions Standards for Hazardous Air Pollutants for Iron and Steel Foundries at 40 C.F.R. Part 63 Subpart EEEEE (the MACT). P40 is also subject to the New Source Performance Standards for Calciners and Dryers in Mineral Industries at 40 C.F.R. Part 60 Subpart UUU (Subpart UUU). NSPS Subpart UUU requires owners and operators of affected facilities to monitor opacity by either installing a continuous opacity monitor (COM) or performing Method 9 visible emissions (VE) observations on each day of operation. The MACT requires that owners and operators of affected sources monitor PM emissions with a BLD system on each baghouse. Waupaca Foundry chooses to install and operate BLD systems at all the baghouses at the foundry, whether subject to the MACT or not, and follows the September 1997 EPA BLD guidance ("Office of Air Quality Planning and Standards (OAQPS) Fabric Filter Bag Leak Detection Guidance") in operating, maintaining and monitoring the BLD systems at the facility.

Mr. Klafka's February 19, 2013, letter specifically requests that EPA approve use of a BLD system to monitor PM emissions from P40 in lieu of either a COM or Method 9 VE readings as specified by Subpart UUU. EPA reviewed the information in the letter, Waupaca's construction permit application for P40, and the draft permit for P40 put out

for public comment by Wisconsin Department of Natural Resources. EPA notes that Subpart EEEEE is incorporated in entirety in the draft permit. EPA concludes that a BLD system is an effective alternative to a COM or Method 9 VE readings for monitoring PM emissions from P40. Therefore, EPA approves the BLD system as an alternative monitoring method for the P40 - Sand Cooler, providing Waupaca installs, operates, maintains, monitors, keeps records, and submits reports for the P40 BLD system as specified by the MACT provisions applicable to BLD systems. If you have any questions, please feel free to contact Bonnie Bush at 312.353.6684 or bush.bonnie@epa.gov.

Sincerely,



Sara J. Breneman
Chief
Air Enforcement and Compliance Assurance Branch

cc: Steve Klafka, P.E.
Environmental Engineer
Wingra Engineering, S.C.