



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

SEP 04 2012

REPLY TO THE ATTENTION OF:

Bryant Esch  
Environmental Coordinator  
Thyssenkrupp Waupaca, Inc. – Plant 2/3  
1955 Brunner Road  
Waupaca, Wisconsin 54926

Re: Request for Alternative NSPS Monitoring Method for Thermal Sand Reclamation System

Dear Mr. Esch:

The purpose of this letter is to respond to the August 6, 2012, 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 thermal sand reclamation system being installed at Thyssenkrupp Waupaca's foundry (Waupaca Foundry) in Waupaca, Wisconsin.

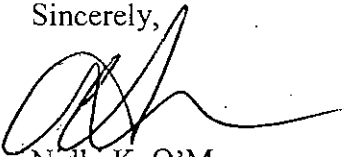
Waupaca Foundry is a major source, subject to, among other things, Clean Air Act Title V permitting requirements and the National Emissions Standards for Hazardous Air Pollutants for Iron and Steel Foundries at 40 C.F.R. Part 63 Subpart EEEEE (the MACT). The new sand reclamation system is subject to the New Source Performance Standards for Calciners and Dryers in Mineral Industries at 40 C.F.R. Part 60 Subpart UUU (Subpart UUU), but it is not subject to the MACT. Waupaca Foundry will operate two baghouses at the new sand reclamation system. Subpart UUU requires that Waupaca Foundry monitor the sand dryer's particulate matter (PM) emissions by continuous opacity monitoring (COM) or daily performance of Method 9 to check visible emissions (VE). For existing subject PM emissions sources at the foundry, the MACT requires use of BLD systems. 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 August 6, 2012, letter specifically requests that EPA approve use of a BLD system to monitor PM emissions from the thermal sand reclamation system in lieu of either the COM or Method 9 VE readings specified by Subpart UUU. After reviewing the August 6 letter, EPA requested further information on the thermal sand reclamation

system, baghouse operating parameters, the BLD system operating parameters, and proposed monitoring and maintenance procedures for the BLD system. Mr. Klafka supplied that information to EPA in an August 28, 2012 email. EPA notes that Subpart EEEEE is incorporated in entirety in Waupaca Foundry's current Title V permit.

Upon review of all the submitted information, including the current Title V permit and the application for a construction permit for the thermal sand reclamation system, EPA concludes that a BLD system is an effective alternative to a COM or Method 9 VE readings for monitoring PM emissions. Therefore, EPA approves the BLD system as an alternative monitoring method for the thermal sand reclamation system, providing Waupaca seeks a permit for the thermal sand reclamation system that includes installation, operation, maintenance, monitoring, recordkeeping, and notification provisions for the BLD system that are both consistent with the MACT provisions applicable to BLD systems and with the corresponding provisions in the current Title V permit for existing BLD systems at Waupaca Foundry. If you have any questions, please feel free to contact Bonnie Bush at 312.353.6684 or [bush.bonnie@epa.gov](mailto:bush.bonnie@epa.gov).

Sincerely,



Nidhi K. O'Meara  
Acting Chief  
Air Enforcement and Compliance Assurance Branch

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