



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

REPLY TO THE ATTENTION OF:

SEP 25 2014

Mr. Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft part 70 operating permit, permit number 127-34630-00131, for MonoSol, LLC, located in Portage, Indiana. 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 comments:

- 1.) Condition D.1.1(a) establishes a synthetic minor volatile organic compound (VOC) emission limit across film casting lines L20 through L27 to no more than 95 tons per 12-month period. Since the source is located in an ozone nonattainment area, the synthetic minor VOC emission limit is intended to avoid emission offset requirements. From the technical support document (TSD), Appendix A, page 1, note (d), VOC emissions from the film casting lines are methanol emissions. Condition D.1.3 limits the resin's methanol content to no more than 3% by weight, with a 12-month rolling average of 1.25% or less. Compliance with the methanol content and VOC emission limits is determined monthly.

The permit does not appear to include a production or operational limitation on the film casting lines in addition to the VOC emission limit. A production or operational limitation is required to appropriately limit potential to emit. This is described in the June 13, 1989, guidance document "Guidance on Limiting Potential to Emit in New Source Permitting". Please clarify whether the permit currently contains a permit condition that imposes a production or operational limit or add a permit condition that establishes a production or operational limitation.

2.) Condition D.1.1(b) establishes synthetic minor emission limits on nitrogen oxides (NOx) and VOC. This condition also establishes a restriction on the source-wide natural gas throughput. The restriction on natural gas throughput affects different types of emission units, including drying ovens, boilers, and other heaters. According to page 8 of appendix A of the TSD, the limit of the natural gas throughput is calculated based on emission factors listed in AP-42, Volume I, Fifth Edition (AP-42), tables 1.4-1 and 1.4-2.

The permit does not include testing requirements to ensure that natural gas combustion units will be able to meet the AP-42 NOx and VOC emission limits. The introduction to AP-42 discusses that the emission factors may be appropriate for estimating emissions from the facility. However, the introduction continues to explain that the use of AP-42 emission factors is not recommended for use as source-specific permit limits for a number of reasons, including variability of emissions between different sources and emission units. Since the source-wide natural gas throughput restriction affects different types of emission units, and since the source-wide potential to emit VOC and NOx are 99.56 tons per year and 82.84 tons per year, respectively, even a small increase in either VOC or NOx emissions could increase the VOC or NOx potential to emit over the emission offset applicability threshold. Without testing to ensure the emission units can meet the emission limits, it is not clear whether the source will still be able to avoid emission offset requirements. Please add a testing requirement to the permit to ensure that the combustion units at the facility are able to meet the VOC and NOx emission limits or explain why the use of the AP-42 emission factors ensures compliance with the emission limits.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,



Genevieve Damico
Chief
Air Permits Section