



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

MAY 17 2013

REPLY TO THE ATTENTION OF:

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 prevention of significant deterioration and draft part 70 operating permit, permit number T147-32322-00062, for Ohio Valley Resources, LLC, located in Rockport, 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. Best available control technology emission limits for carbon dioxide (CO₂), particulate matter (PM), PM₁₀, PM_{2.5}, carbon monoxide, and volatile organic compounds are included within the draft permit based on a 3-hour averaging time¹. Since compliance with these emission rate limits is generally determined by a one-time stack test and monthly recordkeeping, how is the three-hour average determined?
2. The CO₂ limit for the primary reformer in permit condition D.2.4(b)(5) is 1.28 tons CO₂ per tons of ammonia produced. The ammonia production limit in permit condition D.2.4(b)(1) is 1,022,000 tons per 12 consecutive month period. This calculates to potential emissions of 1,308,160 tons per 12 month period, which is higher than the 1,304,033 tons per year limit listed in the technical support document. Please clarify the correct potential emissions for this unit.

¹ Permit conditions D.1.4, D.2.4, D.3.4, D.4.4, and D.5.4.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sam Portanova at (312) 886-3189 or Michael Langman at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the typed name.

Genevieve Damico
Chief
Air Permits Section