



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUL 19 2011

REPLY TO THE ATTENTION OF:

Ed Bakowski
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

The U.S. Environmental Protection Agency has the following comments on the Illinois Environmental Protection Agency's (IEPA) draft of the Clean Air Act Permit for Shale Inland Stamping and Fabricating (Shale) (application number 06010027).

1. Condition 5.3.2 of the draft permit lists two applicable requirements from the state implementation plan that apply to the facility as a whole. However, section 5.0 of the permit does not include monitoring, recordkeeping or reporting necessary to assure compliance with these applicable requirements pursuant to 39.5(7)(b) of the Act. IEPA must ensure that the permit contains monitoring, recordkeeping or reporting necessary to assure compliance with all applicable requirements and the statement of basis must include the rationale for the periodic monitoring required in section 5.0 of the permit.
2. Condition 5.3.3(d) discusses the Fugitive Particulate Matter Operating Program (FPMOP). The permit does not give the date of the FPMOP being incorporated nor does the permit include the table and map referenced in the condition. *See e.g., White Paper 2; In the Matter of Tesoro Refining and Marketing*, Petition No. IX-2004-6 (March 15, 2005)(*Tesoro*), at 9; *In the Matter of Proposed Clean Air Act Title V Operating Permit Issued to Premcor Refining Group, Inc., for Operation of Port Arthur Refinery*, Petition No. VI-2007-2 (February 16, 2007), at 29.
3. Please add the origin and authority to 7.1.9(e).

Thank you for your consideration. If you have any questions or concerns regarding these comments, please contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely,

A handwritten signature in black ink that reads "Pamela Blakley". The signature is written in a cursive style with a large initial "P" and a long, sweeping tail on the "y".

Pamela Blakley
Chief
Air Permits Section