



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

NOV 26 2012

REPLY TO THE ATTENTION OF:

Andrew Hall
Permit Review/Development Section
Ohio Environmental Protection Agency
Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft permits to install and operate, permit numbers P0111496 and P0085510 for MetoKote Corp Plant No. 9 in Sheffield Village, Ohio. To ensure that the source meets 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:

Comments regarding Permit No. P0111496

1. Permit does not clearly indicate what changes are being made at the facility. Permit Number P0111496 lists the permit description as "Controlled pyrolysis cleaning furnace, Model No. PRC-680, and batch burn oven, Model 8714, for cleaning organic residues from metal parts." It is unclear what changes are being made with regard to these units.
2. The permit on p. 19 of 22 states that the Best Available Technology (BAT) requirement for P006 is an afterburner. It is unclear from the description provided for P006 if an afterburner is used at the facility as there are no listed requirements for its operation. Please clarify.

Comment regarding Permit No. P0085510

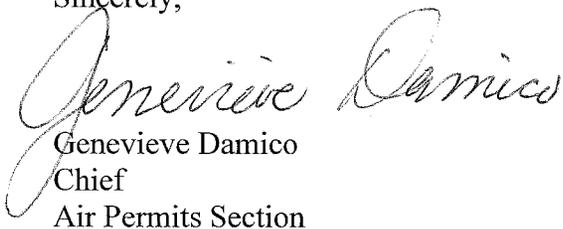
The permit at C.1.b(1)a. (page 14 of 27) includes emission limitations for Volatile Organic Compounds (VOC) not to exceed 9.72 tons per year. The underlying authority for this requirement is BAT, however in C.1.b(2)a. discusses pending revisions to the State Implementation Plan (SIP), that upon approval, will render the emission limitation no longer applicable to the source since the VOC emissions are less than 10 tons per year. It is unclear if the emission unit will be limited to emit less than 10 tons of VOC per year if the requirements are no longer in place. Similar language appears in the requirements for K014 and K015. Please address.

General comments for both permits

1. The permits do not clearly indicate what facility is synthetic minor for. The cover page of the permit indicates that the facility has taken synthetic minor limitations to avoid New Source Review (NSR) and Title V. It would be helpful to identify which pollutants are limited.
2. The permits do not provide general facility information such as emission units, emission information, etc. It would be helpful in the review of permit actions to know what is at the facility.
3. The two draft permits were issued to MetoKote Corp Plant No. 9 on the same day. Have they been assessed together to determine applicability to NSR?

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,


Genevieve Damico
Chief
Air Permits Section