



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



REPLY TO THE ATTENTION OF:

Jimmy Chou  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street  
Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

RE: Comments on Proposed Federal Operating Permit for Dresser Inc.

Dear Mr. Chou,

The U.S. Environmental Protection Agency has reviewed the proposed Title V permit, permit number 268006750-P10, for Dresser Inc. (Dresser) in Waukesha, Wisconsin. 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:

1. The proposed permit on pages 17 and 27 appears to change allowable emissions for emissions sources and the facility as a whole. Title V permits incorporate existing construction permits and do not have the authority to change existing emissions limits. Please explain how emissions limits at the facility have not changed or revise the permit to retain existing limits.
2. The proceeding Title V permit had emission limitations, monitoring and recordkeeping requirements for test cells 1 through 4. The proposed permit on page 17 no longer lists two emissions sources, test cells 1 and 3, in that section. Please include any applicable requirements that apply to test cells 1 and 3 or explain why test cells 1 and 3 no longer have applicable requirements. Please demonstrate that cells 1 and 3 comply with requirements through measurements and record keeping.
3. The limits for processes P19, P20, P21, P22, P23, P24, P25 are vague and unenforceable as written because they do not include measurable limitations that can be used to show compliance with the limitations. Please clarify the limitations and compliance method for each of the units.

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 Jesse McGrath, of my staff, at (312) 886-1532.

Sincerely,

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

Genevieve Damico  
Chief  
Air Permits Section