



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

JAN 22 2016

REPLY TO THE ATTENTION OF:

Andrew Hall
Permit Review/ Development Section
Ohio Environmental Protection Agency,
Department of Air Pollution Control
50 West Town Street Suit 700
PO Box 1049
Columbus, Ohio 43216

Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the draft Permit to Install and Operate (permit number P0119200) for S.H. Bell – Stateline Terminal in East Liverpool, 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:

1. The permit strategy write-up notes that S.H. Bell will take federally enforceable limits on Hazardous Air Pollutants (HAP) to maintain potential to emit below Title V thresholds. The permit, in Section B, contains a facility-wide emission limit, monitoring requirements, compliance method, and recordkeeping for materials containing chromium. The facility has identified that it emits manganese, a HAP, however, the permit does not have a similar enforceable emission limitation for manganese to ensure that the total HAP emissions stays below Title V thresholds. Please add an emission limit for manganese and appropriate compliance monitoring, recordkeeping and reporting requirements.
2. Throughout the permit opacity requirements use 40 C.F.R. Part 60, Appendix A, Method 9 as the compliance method, however, the permit requires S.H. Bell to conduct opacity observations only if required to do so by Ohio EPA. Given the nature of this facility and the materials processed, opacity observations should be conducted on a regular basis while the equipment is in use. Please add the requirement to conduct Method 22 and Method 9 monthly to demonstrate compliance with the opacity limits.
3. The facility cites specific control efficiencies throughout the permit. For example, the Area 3 Screener at page 65 of 152 cites control efficiencies of 91.9% and 97.9% (only for TP#1) for the baghouse. The permit does not include any verification of the control efficiencies stated. Given the nature of this facility and the materials processed, verification of the control efficiencies would better ensure that the facility is in compliance with its emission limitations. Please add requirements to the permit to test each unit to determine the control efficiencies at least once per permit term.
4. The facility operates several capture systems and baghouses, however regular testing is not required. For example, the North Bag Filling Station, emission unit F008, operates a capture and collection system and baghouse to control particulate emissions and testing of the baghouse is

only required as requested by Ohio EPA. The requirements for F008 do not specify how the facility will determine compliance on an ongoing basis since testing is done by request only. Please add requirements for testing of the capture systems and baghouses at least once per permit term to assure compliance as well as procedures to determine ongoing compliance to ensure that the facility is in compliance with its synthetic minor limits.

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

Sincerely,



for Genevieve Damico
Chief
Air Permits Section