



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

MAY 30 2014

REPLY TO THE ATTENTION OF

Mr. 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 (PSD) permit, permit number 129-33077-00050, for Abengoa Bioenergy of Indiana, LLC, located in Mt. Vernon, 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:

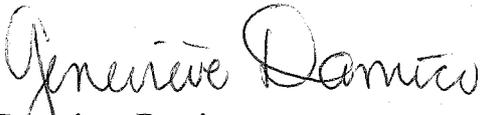
1. The Technical Support Document (TSD) of the draft permit does not address the applicability status of new source performance standards for Synthetic Organic Chemical Manufacturing Industry (SOCMI) air oxidation unit processes (40 C.F.R. Part 60, Subpart III) and SOCMI reactor processes (40 C.F.R. Part 60, Subpart RRR). Please clarify if these standards apply to the proposed project.
2. Permit condition D.7.9 states that the permittee shall maintain the records required in 40 C.F.R. Part 60, Subpart VVa in order to document compliance with condition D.7.1(b) (emission limits for volatile organic compounds and acetaldehyde). This condition does not provide a specific citation under Subpart VVa for the recordkeeping requirement. As a result, it is not clear how this permit condition is sufficient to demonstrate compliance with the emission limits in condition D.7.1(b). Please include a specific citation to the recordkeeping requirement that documents compliance with condition D.7.1(b).
3. Permit condition D.7.3 limits particulate emissions pursuant to 326 IAC 6-2-4. The permit should include monitoring, reporting, or recordkeeping requirements to demonstrate compliance with these emission limits.

4. Typographical Errors:

- a. Appendix B of the TSD is labeled as "Air Quality Impact Analysis." This appendix should be titled "Best Available Control Technology Analysis."
- b. Permit condition D.4.6 refers to "Conditions D.4.1(c) and (f) through (k)." However, permit condition D.4.1 has been renumbered as part of this draft permit and the citation in condition D.4.6 should be adjusted accordingly.

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

Sincerely,

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

Genevieve Damico
Chief
Air Permits Section