



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

MAR 23 2015

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 initial federally enforceable state operating permit (FESOP), permit number 127-34949-00132, for Urschel Laboratories, located in Chesterton, 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.) We request that the permit include more stringent monitoring requirements to ensure compliance with the particulate matter (PM) smaller than 10 and 2.5 microns (PM<sub>10</sub> and PM<sub>2.5</sub>, respectively) and hazardous air pollutant (HAP) emission limits. The FESOP is being issued on the basis that the source is not a Title V major source for PM<sub>10</sub> and PM<sub>2.5</sub> and is an area source of HAPs. Currently, the permit requires daily visible emissions (VE) notations to ensure proper operation of all PM control devices. The permit requires stack testing of some, but not all, control devices at least once every five years. It is not clear whether daily VE notations and periodic stack testing of some, but not all, of the PM control devices will ensure continuous compliance with the emission limits. Additional monitoring including, but not limited to, parametric monitoring of the control devices, installation and operation of bag leak detection systems for the baghouses, or periodic testing for all PM control devices, will help to ensure that the emission limits are achieved and that the source is not a Title V or major HAP source.

A Title V major source, as defined at 326 IAC 2-7-1(22), is a source that emits or has the potential to emit (PTE) 100 tons per year or more of any air pollutant subject to regulation. A HAP major source is a source with PTE, in the aggregate, of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAPS. After issuance of the FESOP, the sourcewide PM<sub>10</sub> and PM<sub>2.5</sub> PTE is 95.73 and 91.76 tons per year, respectively, and the source wide single and total HAP PTE is 9.72 and 22.87 tons per year, respectively (see page 13 of the technical support document (TSD)). In particular, we note that the PM<sub>10</sub> limit is within five tons of the Title V major source threshold and the single HAP limit is less than half a ton from the HAP major source threshold. Since these limits are close to the major source threshold, additional

monitoring may be necessary to ensure that the source is complying with the emission limits.

In a phone discussion regarding this issue, your staff mentioned that the source provided comments resulting in updated emission estimates for PM<sub>10</sub>, PM<sub>2.5</sub>, and HAPs that may decrease the sourcewide unrestricted and limited PTE for these pollutants. In lieu of more stringent monitoring requirements, please clarify how the current monitoring requirements are sufficient to assure that the source will continuously comply with the PM<sub>10</sub>, PM<sub>2.5</sub>, and HAP emission limits.

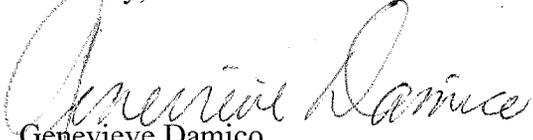
- 2.) This initial FESOP establishes synthetic minor emission limits for PM<sub>10</sub>, PM<sub>2.5</sub>, and single and total HAPs. Specifically, the permit will require the facility to operate baghouses and dust collectors to control PM<sub>10</sub>, PM<sub>2.5</sub>, and metal HAP emissions from several emissions units at the source. Metal HAP emissions can be determined as a weight percentage of the PM emissions.
  - a. Page 28 of the TSD explains that the permit does not require testing for dust collectors ABF-1 through ABF-4 or baghouses PCU-07 through PCU-09 since the minimum control efficiencies of these dust collectors and baghouses will meet the permitted PM emission limits. We request that you identify the assumed minimum control efficiencies of the control devices and include within the permit record the calculation or other additional justification to support that PM emissions will meet the permitted emission limits.
  - b. Page 28 of the TSD states that the permit does not require testing for dust collectors ABF-1 through ABF-4 and PS-1 or for baghouses PCU-07 through PCU-09 to demonstrate compliance with the HAP limits since HAP content of each raw material can be obtained from the material safety data sheet (MSDS) and is provided as a weight percent. The permit, as currently written, does not include a requirement to maintain MSDS consulted to determine HAP content. We request that you add a condition to the permit requiring maintenance of all of the MSDS if this is the method that will be used to determine the HAP content of the raw materials and HAP emissions from the facility.
- 3.) Condition E.2.2 lists the applicable requirements of 40 C.F.R. 60, Subpart JJJJ, for several natural-gas fired emergency generators rated between 50-100 kilowatts (KW). Each natural gas-fired emergency generator is a spark ignition internal combustion engine (SIICE). We request that you review the applicable requirements of 40 C.F.R. 60, Subpart JJJJ, as they apply to these emergency generators and update the permit as necessary.

Condition E.2.2(2) refers to 40 C.F.R. § 60.4233(a), a requirement applicable to SIICE with a maximum engine power less than or equal to 19 KW. The smallest generator listed in the emissions unit description is rated at 50 KW. Please clarify whether 40 C.F.R. § 60.4233(a) is an applicable requirement for each emergency generator. If 40 C.F.R. § 60.4233(a) is determined to no longer be applicable to the generators, then the

compliance requirements of 40 C.F.R. §§ 60.4238, 60.4241, and 60.4243, as listed in conditions E.2.2(6) through (8), may also need to be reevaluated and updated.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,



Genevieve Damico  
Chief  
Air Permits Section