



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

FEB 19 2013

REPLY TO THE ATTENTION OF:

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

RE: EQUISTAR Chemicals, LP Draft Title V Permit

Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the draft Title V permit, permit number P0109115, for EQUISTAR Chemicals, LP in Fairport Harbor, 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 comment:

The permit on page 23 of 30 includes an opacity limitation for emission units P001, P002, P005, and P007. There are no requirements in the permit for monitoring and recordkeeping opacity from these emission units. Requirements for opacity monitoring and recordkeeping should be added to the permit.

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,

A handwritten signature in black ink, appearing to read "Genevieve Damico" followed by a stylized flourish.

Genevieve Damico  
Chief  
Air Permits Section