



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

JUN 05 2014

REPLY TO THE ATTENTION OF

Mr. 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,

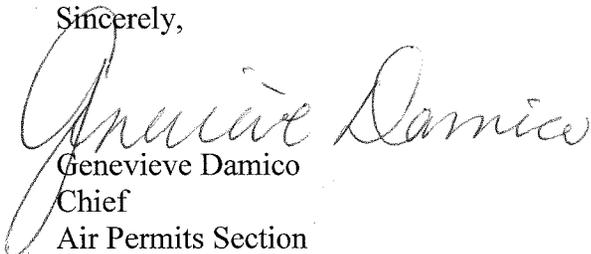
The U.S. Environmental Protection Agency has reviewed the draft Permit-to-Install and Operate (permit number P0115936) for Ashtabula Tire Partners (ATP) in Ashtabula, Ohio. The proposed permit would allow the installation of a new tire pyrolysis facility producing synthetic gas, oil and carbon black. ATP has taken a synthetic minor limitations on Particulate Matter with a diameter of 10 microns or less (PM10) to avoid applicability to Title V. 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. Units P001, P002, P005, P006, and P007 use baghouses to control and limit PM10 emissions and pressure drop monitoring issued to demonstrate compliance with these limits. Bag leak detection systems are a more accurate indicator of baghouse performance and, therefore should be used in conjunction with or in lieu of monitoring pressure drop across the baghouses. Also, to show compliance with synthetic minor limits the source should be using emission factors based on the latest compliant stack test instead of emission factors given by the manufacturer or by AP-42.
2. To ensure continuous compliance and enforceability of emission limitations and synthetic minor conditions, the source should conduct emission testing on regular intervals. The frequency of the testing should be based on factors such as but not limited to compliance history, compliance margin, and variability of the operation.
3. Units T001, T002, T003, and T004 may show compliance with monthly volatile organic compound limitations by recordkeeping and the use of U.S. EPA TANKS software and/or other process simulation program(s). The source should keep record of which program was used and the data input into the software used to show compliance.

4. Units P003 and P004 are subject to 40 CFR Part 60, Subpart KKKK. Applicable sections include 60.4345(a) – (e) and 60.4350(a) – (h) which are requirements for Continuous Emission Monitoring Systems (CEMS). It is not clear from the description of the permit if CEMS are being operated on these units, please clarify. If applicable, include applicable requirements for operation, maintenance, and recordkeeping associated with CEMS and CEMS data. Also, if CEMS are being operated, data from the CEMS should be used to show compliance with emission limitations for pollutants monitored by CEMS.
5. Permit conditions for units B001, B002, B003 and B004 require venting to a flare during start-up, shutdown, during an event where the turbines are not operational, and during emergencies. The flare is not listed in the permit as an emission unit or part of any emission unit group. Please include the flare and operation, recordkeeping and monitoring requirements.

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,


Genevieve Damico
Chief
Air Permits Section