



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

APR 02 2016

REPLY TO THE ATTENTION OF:

Mr. Andrew Hall  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Title V Permit-to-Install (permit number P0115784) for Cargill, Incorporated – Salt Division (Cargill) in Akron, Ohio. The proposed permit would allow the installation of a 180.97 MMBtu per hour natural gas-fired boiler to replace four existing coal-fired boilers (B001 – B004) and one existing natural gas-fired boiler (B006). The project shows that there will be an overall decrease in emissions. To ensure that the source meets Clean Air Act (CAA) 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 does not give an analysis of the contemporaneous period as described in the definition for major modification in the Non-attainment New Source Review (NNSR) and Prevention of Significant Deterioration (PSD) regulations. All increases and decreases of emissions should be considered in determining whether a project will be a major modification. As the permit is currently written, the decreases seem to be considered in step 1 of the assessment, which constitutes project netting, which is not allowed. The permit must have a clear discussion of the actual emission increases and decreases from the affected units during the contemporaneous period to support Ohio Environmental Protection Agency's conclusion.
2. The permit strategy write-up uses different contemporaneous periods for nitrogen oxides (NO<sub>x</sub>) and carbon dioxide equivalent (CO<sub>2</sub>e), 2010 – 2011 and 2006 – 2007, respectively. The 5-year contemporaneous periods must be the same for all pollutants as described in 40 C.F.R.52.21 and OAC 3745-31-01. The consecutive 24-month periods used may differ between pollutants. Additionally, the 24-month period used for CO<sub>2</sub>e is outside of the 5-year period immediately preceding construction of the project. An appropriate 24-month period must be used in the PSD analysis.
3. Appendix A of the permit application includes calculations used to determine Baseline Actual Emissions (BAE) for the PSD analysis. The calculated values determined are for

potential emissions from B001 – B004 and B006. In the PSD regulations, §52.21(b)(48)(i) and OAC 3745-31-01(O) BAE is defined for existing electric steam generating units. The use of potential emissions in place of BAE is not acceptable for the netting analysis. The NNSR and PSD analyses must be consistent with the regulations.

4. The permit on page 21 includes the compliance determination requirements for NO<sub>x</sub>. The paragraph incorrectly references section d)(4) as requirement for use of continuous emission monitor and it is mentioned in section d)(3). Please correct the reference.

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