



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

FEB 11 2013

REPLY TO THE ATTENTION OF:

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 initial Title V Permit to Operate for Independence Recycling, Inc., permit number P0096140, located in Valley View, Ohio. 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 comment.

1. The Statement of Basis only copies the terms and conditions of the permit without providing their legal and factual basis as required under 40 C.F.R. §70.7(a)(5). The Statement of Basis does not provide the legal and factual basis for decisions not to include monitoring, recordkeeping, and reporting terms in the permit.
2. Please note that amendments to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines will go into effect on April 1, 2013. 78 *Fed. Reg.* 6674 (January 30, 2013). If the permit is finalized on or after that date, please ensure that it reflects the amendments as applicable to the source.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or Kaushal Gupta, of my staff, at (312) 886-6803.

Sincerely,


Genevieve Damico
Chief
Air Permits Section