



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 10 2011

Ed Bakowski
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

The U.S. Environmental Protection Agency has the following comments on the Illinois Environmental Protection Agency's draft of the Clean Air Act Permit (CAAP) for Icon Identity Solutions (permit number 98080019).

1. There is an inconsistency in the record retention time between conditions 3.5(c)(ii) and 2.5(b). Since condition 2.5(b) is the more stringent requirement, please subsume the record retention requirements of 35 Illinois Administrative Code 254.134 in condition 3.5(c)(ii) into the requirements of 39.5(7) of the Illinois Environmental Protection Act (Act) listed in condition 2.5(b).
2. 39.5(7) of the Act requires the CAAP to include all applicable requirements. This permit does not appear to include all of the requirements from construction permit 97120020, in particular usage limits and work practice requirements. Please include all requirements from underlying construction permits or explain why these requirements are no longer applicable.
3. The origin and authority for condition 4.2(d)(ii)(B) should be 39.5(7)(b) not 39.5(7)(a) as listed.
4. The natural gas usage records required by 4.2(d)(ii)(B) should be monthly records rather than annual records in order to comply with requirement to demonstrate compliance with annual limits in 4.2(d)(i)(E) using a running total of 12 months of data.

Thank you for your consideration. If you have any questions or concerns regarding these comments, please contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely,

A handwritten signature in black ink that reads "Pamela Blakley". The signature is written in a cursive style with a large, prominent initial "P".

Pamela Blakley
Chief
Air Permits Section