

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

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: Comments for GE Lighting Inc. – Bucyrus Lamp Plant, draft permit number P0114046

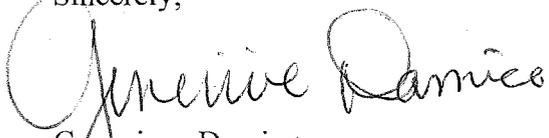
Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the draft permit to install, permit numbers P00114046, for GE Lighting Inc – Bucyrus Lamp Plant. 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. The permit authorization cites that the emission factors for P007, P008, and P035 have been amended in the permit. The permit does not provide any detail as to why these emission factors were amended and the origin of the new emission factors. Please clarify why the emission factors were amended and where the new emission factors originated from.
2. Emission limitations for P007, P008, and P035 have been increased while the emission factors used to calculate compliance have been lowered. Please clarify why the emission limitation would need to increase if the emission factors have decreased.
3. The permit includes the removal of requirements for P007, specifically, for those emissions generated “prior to T8 conversion.” The removal of these conditions were not included in the permit description or explained in the permit strategy write up. Please provide explanation for the removal of these conditions.
4. On page 23 of 46 of the permit, testing requirements to show compliance with particulate emission limitations for P007 are described. The permit notes that a control efficiency of 99% is assumed for the baghouse. The permit does not require testing at the baghouse to verify the 99% control efficiency. Periodic testing of the baghouse(s) should be included to ensure compliance with the limitations.

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 cursive script that reads "Genevieve Damico". The signature is written in black ink and is positioned above the typed name.

Genevieve Damico
Chief
Air Permits Section