



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

JUL 26 2016

REPLY TO THE ATTENTION OF

Andrew Hall
Permit Review/Development Section
Ohio Environmental Protection Agency
Department of Air Pollution Control
50 West Town Street Suite 700
P.O. Box 1049
Columbus, Ohio 43216

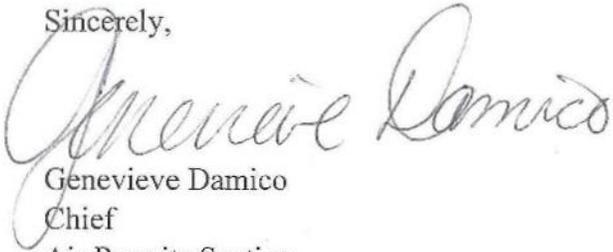
Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft permit-to-install, permit number P0119905, for OSCO Inc. – Jackson Division located in Jackson, 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 comments:

1. The monitoring requirements for the 14.45 tpy particulate matter 10 and particulate matter 2.5 emission limit discussed above are daily visible emission checks. Visible emission checks are not sufficient to demonstrate compliance with the particulate matter emission limits. The permit must include additional monitoring requirements that assure compliance with the particulate emission limits.
2. The draft permit's description for emission units F004 and F009 and permit condition C.2.c)(1) say the baghouse serving these units is rated at 99.5% capture efficiency and 99% control efficiency. However, permit conditions C.3.b)(2)a. and C.3.c)(1) state a baghouse capture efficiency of 90%. Please clarify the rated capture efficiency of the baghouse and assure that this efficiency level is consistent with the source's ability to meet the permitted particulate emission limits for these units. The permit should also include testing to verify the stated capture and control efficiencies of the baghouse.
3. Permit condition B.2.a)(1) establishes facility-wide hazardous air pollutant (HAP) limits of 9.9 tpy for individual HAP emissions and 24.9 tpy for total combined HAP emissions. The permit, however, does not include any monitoring or testing requirements for the HAP limits. The permit must include monitoring and/or testing requirements that assure compliance with these HAP emission limits.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name and title.

Genevieve Damico
Chief
Air Permits Section