



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

REPLY TO THE ATTENTION OF

MAY 26 2016

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 Title V permit renewal, permit number P0117372, for Tembec BTL SR, Inc. located in Toledo, 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. Permit condition 1.d)(2) (*pg. 21*) requires daily visible emission (VE) checks each day the source burns #6 fuel oil "when weather conditions allow." The permit should clarify the criteria used to determine if weather conditions allow for these daily VE checks.
2. Permit condition 2.b)(1)(b) (*pg. 24*) says "as indicated below, there are no applicable emissions limitations or control measures required by this rule..." (emphasis added). This permit condition should clearly indicate where in the permit this determination is made.
3. 40 CFR 63.1412(k)(2) lists engineering assessment requirements for instances where the Total Resource Effectiveness (TRE) index value of a unit is less than or equal to 4.0. According to permit condition 3.b)(2)(a) (*pg. 33*), the TRE for emission unit P003 is 3.4. Based on this index value, the permit should list the requirements of 40 CFR 63.1412(k)(2) as applicable to P003.
4. Permit condition 3.f)(2) (*pg. 36*) establishes an engineering assessment as the method for determining emissions for continuous process vents pursuant to 40 CFR 63.1414(d)(10). This permit condition should also reference 40 CFR 63.1412(k), which lists requirements for engineering assessments.

5. Permit condition 4.b)(1)(b) (pg. 37), which cites 40 CFR 63.1403(a), states that “when emissions are vented to a control device or control technology as part of complying with this subpart, emissions shall be vented through a closed vent system meeting the requirements of 40 CFR part 63, subpart SS.” The permit should clarify whether emissions for Emissions Unit Group P008, P009, P010, P011 are indeed vented to a control device or control technology such that the requirements of Subpart SS apply to this emissions unit group.
6. Permit condition 4.b)(2)(a)(i) (pg. 39), which cites the requirement of 40 CFR 63.1400(k), says “the emission limitations set forth in 40 CFR Part 63, Subpart OOO apply at all times , except....” The permit should include more specific details of what emissions limitations set forth in 40 CFR Part 63, Subpart OOO apply to this emissions unit group.
7. Permit conditions 4.b)(2)(c) (pg. 40) and 5.b)(2)(c) (pg. 49) say that as an alternative to complying with 40 CFR 63.1406(a), the source may “vent all organic hazardous air pollutant (HAP) emissions from the reactor batch process vent to a non-combustion control device achieving an outlet organic HAP concentration of 50 ppmv or less.” It is not clear from this language whether the source is indeed venting emissions to such a control device. The permit should specify which method of compliance the source is following.
8. Permit conditions 4.c)(2) (pg. 40), 4.d)(3) (pg. 41), 5.c)(2) (pg. 49), and 5.d)(3) (pg. 50) cite the requirement in 40 CFR 63.1413(a) to establish parameter monitoring levels for the reactor continuous process vent condenser. The permit should specify where the parametric monitoring levels established per this requirement are documented.
9. Permit condition 4.d)(3) cites 40 CFR 63.1022(b) (pg. 42) as requiring equipment subject to 40 CFR 63.1023 through 63.1034 to be specifically identified. However, the permit doesn’t list such equipment. The permit should specify where the equipment subject to this provision is identified.

Typographical errors:

10. Permit condition 5.c)(2) (pg. 49-50) discusses compliance with “the emission reduction specified in b)(1)g.” pursuant to 40 CFR 63.1413(a). However, permit condition b)(1)g (pg. 47) does not specify an emissions reduction. This condition should be corrected to properly cite the emission reductions in question.
11. In permit condition 2.b)(1)(j) (pg. 25), “pressure relied devices” should say “pressure relief devices.”

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.

Genevieve Damico  
Chief  
Air Permits Section