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

AUG 0 9 2013

REPLY TO THE ATTENTION OF:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Federally Enforceable Permit to Install and Operate, permit number P0111325, for Whemco – Ohio Foundary in Lima, Ohio. 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 testing method specified to meet opacity requirements in C.1.f)(1)b., C.2.f)(1)b., C.3.f)(1)b.,C.4.f)(1)b., C.5.f)(1)e. and C.6.f)(1)d. is listed as Method 22 of 40 CFR, Part 60, Appendix A. Method 22 does not measure opacity; Method 9 should be used to show compliance with the opacity requirements.

2. C.3.f)(1)(a) lists the applicable compliance method for PM emissions from the induction furnaces as a calculation using an emission factor of 0.86 lb PM_{10}/ton metal melted from AP-42, Table 12.10-3 (1/95). AP-42 (1/95) lists the emission factor for uncontrolled electric induction furnaces at grey iron foundries as 0.9 lb PM/ton grey iron produced. It is also noted that this emission factor is for metal melting only. It is unclear where this emission factor originated from. Regular emissions testing of the units would provide the most accurate emission factors for the facility and would ensure compliance with synthetic minor limitations at the facility.

3. The area source MACT for Iron and Steel Foundries, 40 CFR Part 63, Subpart ZZZZZ, has a limitation of 0.8 lb PM/ton of metal melted. If OEPA intended on using the emission factor of 0.86 lb PM_{10}/ton metal melted to show compliance with FESOP limitations, it would not be in compliance with the MACT requirements at §63.10895(c). Please ensure that an appropriate emission factor is used to show compliance with all applicable requirements.

4. The applicable compliance methods for the emission units are calculations using emission factors. Regular emission testing at the facility will provide the most accurate

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emission factors and would most reliably indicate if the facility is in compliance with its synthetic minor limitations.

5. The permit at C.5.c)(1)a. and C.6.c)(1)(a) requires the facility use a baghouse that can achieve a 95% capture efficiency and a 95% control efficiency. This should be clarified that the baghouse must achieve a minimum of 95% capture efficiency and 95% control efficiency. This capture and control efficiency should be verified through testing. A baghouse leak detection system should be used to monitor the baghouse to ensure continuing compliance with emission limitations.

6. The applicable compliance methods listed in C.5.f)(1)a. and C.6.f)(1)(a) list appropriate test methods to ensure compliance with the emission limitations from the baghouses. Method 5 of 40 CFR, Part 60 should be included for testing of PM emissions.

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,

Richard Angelbeck
for

Genevieve Damico
Chief
Air Permits Section