



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 Environmental Protection Agency,
Department of Air Pollution Control
50 West Town Street Suit 700
PO Box 1049
Columbus, Ohio 43216

OCT 23 2020

Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the draft Title V Permit (permit number P0112455) for Research Organics LLC dba SAFC Cleveland, in Cleveland, 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 permit should specify the minimum heating value of the gas being combusted by the flare, as provided in the 40 C.F.R. §63.11(b).
2. As part of the leak detection and repair program, the permit should provide the option to utilize an optical gas imaging camera as an alternative work practice to Method 21, as provided in 40 C.F.R. §63.11(c) – (e).
3. The permit should specify which requirements from 40 C.F.R. Part 63, Subpart ZZZZ, 40 C.F.R. Part 63, Subpart DDDDD, and 40 C.F.R. Part 60, Subpart IIII are applicable to the facility.

We appreciate the opportunity to provide comment on this draft permit. If you have any questions, feel free to contact me or Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,

A handwritten signature in black ink, appearing to read "Genevieve Damico", followed by the word "FOR" written in a smaller, simpler font.

Genevieve Damico
Chief
Air Permits Section