



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

REPLY TO THE ATTENTION OF:

MAY 20 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 permit-to-install, permit number P0115576, for Alliance Casting Co., LLC, located in Alliance, 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 conditions 1.b(1)a. and 1.f(1)a. (*pg. 15 and 23 of 43*) establish the volatile organic compound (VOC) emission limits and compliance methods for units P045 and P046 (with VOC emissions consisting of DMIPA<sup>1</sup> and non-DMIPA compounds). These conditions characterize the emissions for the 0.05 lb VOC/lb resin limit as fugitive, though it is intended to address all uncontrolled VOC emissions from the resin. In addition, all stack emissions are described as DMIPA emissions, though some non-DMIPA compounds are emitted through the stack. The permit should clarify that the 0.05 lb VOC/lb resin limit includes all uncontrolled VOC emissions (fugitive and stack) for these units.
2. Permit condition 1.f(1)a. (*pg. 23 of 43*) concludes by saying "total VOC emissions are as follows:  $0.0535 \times (735 \text{ tons resin/yr}) \times (2000 \text{ lb resin/ton resin}) \times (1 \text{ ton VOC}/2000 \text{ lb VOC}) = 39.320 \text{ tpy VOC}$ ." This statement should clarify that VOC emissions are based on the actual resin throughput rate and the actual VOC emission rate as described elsewhere in this permit.
3. According to permit condition 1.f(2)a. (*pg. 41 of 43*), emissions testing for units P045 and P046 shall be conducted per the schedule established in the source's Title V permit.

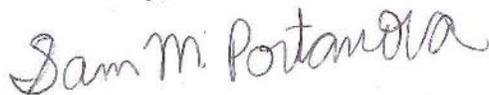
<sup>1</sup> DMIPA = dimethylisopropylamine

While ongoing emissions testing requirements and schedules are indeed to be addressed in the source's Title V permit, this permit-to-install should include the emission testing requirements and schedules that are specific to this permitting action.

4. The emission factor for VOC fugitive emissions in permit condition 1.f)(1)c. (pg. 24 of 43) is based on test data from the resin supplier. The permit should clarify that this emission factor only applies to resins that are demonstrated to meet or exceed this test data.
5. Throughput of resin is limited to 735 tons per year (tpy) based on a 12-month rolling average in permit condition 1.b)(2)b. (pg. 17 of 43). Compliance with this limit is determined by recordkeeping of the monthly quantity of resin processed (see permit condition 1.d)(1)d.-f.) (pg 19 of 43). In order to strengthen the enforceability of this requirement, we recommend that the permit provide details on how the quantity of resin processed is actually measured. For further clarification, the permit may also specify how frequently measurements are taken to obtain the monthly throughput total (i.e.; resin quantity is measured on a daily basis or is measured per batch).
6. Permit condition 1.b)(2)d.i. (pg. 18 of 43) establishes a throughput limit on dry materials "for the purpose of limiting potential to emit (PTE) for PM<sub>10</sub> to the emission limitation listed in b)(1)b above." However, permit condition b)(1)b does not list an emission limitation. This permit language should be corrected to properly cite the purpose of this throughput limit.

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,



for Genevieve Damico  
Chief  
Air Permits Section