



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

JUL 21 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 Suit 700
PO Box 1049
Columbus, Ohio 43216

Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the draft administrative modification to Permit to Install P0115063 (permit number P0120921) for PCS Nitrogen Ohio, L.P. 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. Permit conditions C.1.b), C.2.b), C.3.b) and C.4.b) establish synthetic minor limitations for each emission unit in the permit. The permit should include practically enforceable operating restrictions to ensure the facility's potential to emit (PTE) is below major source thresholds. The permit cites synthetic minor limitations to represent PTE for the emission units, however, it is unclear from the permit if the facility is taking restrictions on production, fuel usage, or by another means. The permit is also lacking the necessary compliance methods, recordkeeping, and reporting requirements to ensure enforceability of the synthetic minor limitations taken to limit emissions. Please revise the permit to include the following to assure that the synthetic minor limitations are properly established and enforceable as a practical matter:
 - a. Identify how the facility is being restricted;
 - b. Compliance methods;
 - c. Emission calculation methods;
 - d. Recordkeeping; and
 - e. Reporting conditions

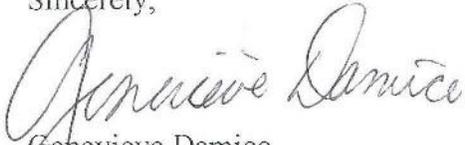
In addition, please refer to the enclosed April 1, 2014 compilation document entitled "Potential to Emit Restrictions: Excerpts from Existing EPA Guidance" for more information regarding limiting potential to emit from facilities.

2. Conditions C.1, C.2, C.3, and C.4 only consider emissions generated by fuel combustion and not any emissions that may be generated by the process. Please review all sources of emissions to ensure that all sources of emissions are being considered and the permit limits effectively limit potential emissions.
3. Section B of the permit includes a requirement to maintain records for emission units B502, B503, B507, B509, B510, J001, J002, P520, P521, P522, P523, P526, P529, P554, P555, P563, P564, T518, T537, T551, T622, T623, T624 and T625 as described in Permit to Install Application No. M0003967. This document is not available for review, so the records required by the application are unclear. The permit should include the specific recordkeeping requirements for the affected emission units to clarify the condition.
4. Conditions C.1.d)(2)(b), C.2.d)(1), and C.4.d)(1) require that various emissions are calculated for each type of operation. The conditions do not include calculation method that should be followed to determine emission from each type of operation. The permit should be revised to identify the calculation methods.
5. The fuel used for emission unit B503, as described in conditions C.1.f)(1)(a), is composite mixture of natural gas, tail gas, purge gas, and flash gas. Due to the different heating values and emissions associated with each type of fuel and the flexibility of the fuel composition, the facility should track volumes of each type of fuel and determine compliance based on actual fuel usage. EPA recommends that compliance be determined monthly using actual fuel usage data required by C.1.d)(1).
6. The conditions in C.1.f), for emission unit B503, state that the emission factors used to estimate emissions from tail, purge and flash gases are from AP-42 Table 1.4-2 (7/98). Table 1.4-2 are emission factors for natural gas combustion, so it is unclear how the emission factors for the other fuels were derived. Please review the emission factors in the permit to ensure the origins are cited correctly.
7. Conditions C.1.f), C.2.f), C.3.f), and C.4.f) include language that says "If required" testing will be completed for several pollutants. The permit must require monitoring, recordkeeping and testing sufficient to assure compliance. The permit term, as written, doesn't require compliance testing. The permit should include a regular testing schedule of at least once a month for opacity and once a permit term for the other pollutants.
8. Condition C.2.f)(1) contains compliance procedures for carbon monoxide (CO) emissions from emission unit P520. The compliance method in the condition refers back to the recordkeeping requirements in C.2.d)(1), however, the condition does not specify a calculation method to determine compliance with the CO limitations. Please include the appropriate calculation method in the permit.
9. Condition C.4.c)(1)c. requires operation of a flare during all dryer depressuring, loop depressuring and refrigeration depressuring periods. The permit does not include any operating requirements for the flare (i.e. presence of a flame, damper position, minimum

VOC concentration for the gas stream, etc.). To ensure proper operation of the flare, the permit should include parametric monitoring and recordkeeping conditions.

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 cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section

Enclosure