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

APR 0 8 2016

REPLY TO THE ATTENTION OF

Matt Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft part 70 operating permit renewal, permit number T089-36407-00384, for National Processing Company. 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:

Condition E.1.2 on page 34 of the permit indicates the portions of 40 C.F.R. 63, Subpart CCC – National Emission Standards for Hazardous Air Pollutants for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants (Subpart CCC) that are applicable to the coil steel pickling line.

a. The following provision appears to be applicable, but is not included in Condition E.1.2:

Subpart CCC	Description
§ 63.1159(c)	General duty to minimize emissions.

b. The following provision of Subpart CCC is included in Condition E.1.2, but does not appear to be applicable:

Permit Condition	Subpart CCC	Reason for Non-Applicability
E.1.2.(5)	§ 63.1160(b)(2)	The source does not operate a hydrochloric acid regeneration plant.

We request that you review the applicability of the above portions of Subpart CCC and revise the permit record accordingly.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (100% Post-Consumer)

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Paymon Danesh, of my staff, at (312) 886-6219.

Sincerely,

Genevieve Damico

Genevieve Damico
Chief
Air Permits Section