



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

FEB 18 2015

REPLY TO THE ATTENTION OF:

Mr. Matthew 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 federally enforceable state operating permit, permit number F175-35252-00029, for Summit Seed Coatings Indiana, located in Salem, Indiana. 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. According to the technical support document (TSD), uncontrolled potential emissions of methanol are 24.83 tons per year (tpy), manganese compounds are 15.98 tpy, and total hazardous air pollutants (HAPs) are 41.20 tpy; which are each above the major source threshold. To demonstrate compliance with the permit's HAP limits, permit condition D.1.13 requires the source to maintain records that include documents such as purchase orders, invoices, and material safety data sheets. However, the draft permit does not explain how such records will demonstrate that HAP emissions at the source will remain below the major source threshold. More stringent monitoring is required to demonstrate that the source's emissions remain below the major source threshold for HAPs.

In a phone discussion regarding this issue, your staff explained that the calculations in the TSD, Appendix A assumed 100% volatilization of volatile organic compounds (VOCs) and HAPs during the seed coating process and that such a volatilization rate would not occur in practice. In addition, your staff said that manganese compound emissions will be controlled by the baghouse required in D.1.9. In lieu of more stringent monitoring requirements, please clarify in the final permit how the compliance demonstration requirements in permit condition D.1.13, along with worst-case volatilization rates and baghouse control of particulate HAPs, are sufficient to assure that HAP emissions from the maximum material processing rate will not exceed the major source threshold.

2. Permit condition D.1.2 limits HAP emissions from the Heid Centracoater Seed Coating Operation (EU-03) to less than 10 tons per twelve consecutive month period for any

single HAP and less than 25 tons per twelve consecutive month period for all HAP emissions combined. The TSD, however, lists a small amount of HAP emissions from other emission units. HAP emissions from these other units when added to the HAP limits for EU-03 result in potential HAP emissions from the entire source above the major source threshold. The HAP emission limits for EU-03 should be lowered to assure that potential HAP emissions source-wide are below the major source threshold.

3. The HAP emission limits in permit condition D.1.2 do not include production or operation limits on EU-03. According to the June 13, 1989, EPA memo entitled, "Guidance on Limiting Potential to Emit (PTE) in New Source Permitting," "an emission limitation alone would limit potential to emit only when it reflects the absolute maximum that the source could emit without controls or other operational restrictions." The permit should include a production or operation limit for this unit unless it can be clarified, as stated in comment #1, that HAP emissions from the maximum material processing rate will not exceed the major source threshold.
4. Please clarify what methods may be used pursuant to permit conditions D.1.8 to demonstrate compliance with VOC content and usage limitations in permit condition D.1.3.

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,



Genevieve Damico
Chief
Air Permits Section