



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

FEB 04 2016

REPLY TO THE ATTENTION OF:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Permit to Install modification, permit number P0112206, for Cargill-Dayton, Inc., located in Dayton, Ohio. This permit modification was issued to incorporate federally enforceable Consent Decree provisions into the permit for the six dryers, to allow an increase in allowable opacity emissions during bakeout of the regenerative thermal oxidizer (RTO), and to address unpermitted volatile organic compounds emissions. 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. Condition j on page 23 of the draft permit requires reporting of any RTO temperature deviation including the time and day of when the RTO temperature deviates below the permit limit. According to Appendix I of the Consent Decree, the permit should also require the reporting of the actual temperature during any deviation. Please add this requirement to the permit.
2. Condition 2 on page 23 of the draft permit lacks the required pH monitoring for the scrubbers that control emission units P032, P104 and P105. According to Appendix I of the consent decree, the scrubber pH needs to be monitored. Please add this requirement to the permit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Richard Angelbeck, of my staff, at (312) 886-9698.

Sincerely,


Genevieve Damico
Chief
Air Permits Section