



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

OCT 15 2015

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:

Thank you for the opportunity to provide the Ohio Environmental Protection Agency (OEPA) our comments on the draft air pollution permit to install and operate for Arclin USA, LLC, (Permit number P0119452). 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 comment:

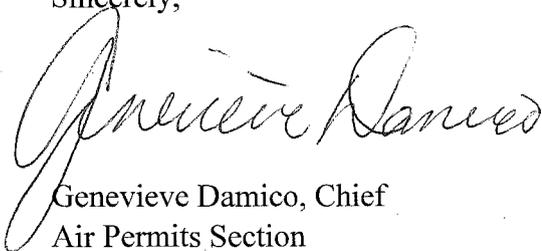
The draft permit provides for a facility-wide hazardous air pollutant (HAP) emission cap of 9.9 and 24.9 tons per year on a 12-month rolling period for any individual and combined HAP respectively (pages 8-10 of the draft permit). As stated in Federal guidance such as the June 13, 1989 EPA memo entitled, Guidance on Limiting Potential to Emit (PTE) in New Source Permitting "practically enforceable PTE limits should include production and/or operation limits in addition to emission limits. Emission limits alone are generally not practically enforceable for the purposes of limiting PTE unless there is a continuous monitoring system, or in certain cases where emissions can be accurately determined, for example, via mass balance calculations." The draft permit allows Arclin USA, LLC, to replace individual emission unit HAP limits with a facility-wide limit. Due to the various individual emission units and the potential HAP emissions from fugitive leaks from valves and flanges, the permit should require operational limits based on the same conditions that the stack test for HAPs was conducted.

These limits should be included in, or at a minimum referenced in, the section within the facility-wide emission limits. The permit should include monitoring, testing, and/or recordkeeping requirements to demonstrate compliance with the HAP emission limits. The monitoring, testing, or recordkeeping requirements must be sufficient to assure compliance with the terms and conditions of the permit so the permit terms would be enforceable as a practical matter.

As part of the total plant fugitive emissions leak detection and repair program, EPA recommends the use of an infrared camera (optical gas imaging instrument) system to accurately account for HAPs, as well as volatile organic compounds, which may be emitted from leaking valves, flanges, and piping components. The provisions of 40 CFR Part 60.18(g)-(i) and 63.11(c)-(e) allow for the alternative work practice, instead of a Method 21 monitor, and use of such technology in assuring compliance with the permit.

Thank you for working with us to assure that this issue is resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras at (312) 886-0671.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in black ink and is positioned above the typed name and title.

Genevieve Damico, Chief
Air Permits Section