



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
MONTGOMERY COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 08-03818**

**Fac ID: 0857042020**

**DATE: 4/1/2008**

Dayton Bag and Burlap  
Scott Owen  
322 Davis ave  
Dayton, OH 45403

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

RAPCA



**Permit To Install  
Terms and Conditions**

**Issue Date: 4/1/2008  
Effective Date: 4/1/2008**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-03818

Application Number: 08-03818  
Facility ID: 0857042020  
Permit Fee: **\$200**  
Name of Facility: Dayton Bag and Burlap  
Person to Contact: Scott Owen  
Address: 322 Davis ave  
Dayton, OH 45403

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**322 Davis Ave.  
Dayton, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to correct the pH monitoring value.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

**4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

#### 10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### 11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

**12. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

**Dayton Bag and Burlap**

**PTI Application: 08-03818**

**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 0857042020**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
Ammonia	4.46

Modification Issued: 4/1/2008

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

**Operations, Property, and/or Equipment - (P001) - Burlap Treat Line No. 1 (The Chief)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The ammonia emissions from this emissions unit shall not exceed 0.51 pounds/hr and 2.23 tons per year (TPY).

**2. Additional Terms and Conditions**

- 2.a The permanent total enclosure shall be constructed to totally enclose the burlap treat line from the dip process to the steam drum dryers to the control device

The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

- a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
- b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
- c. the direction of air flow through all natural draft openings shall be into the

Emissions Unit ID: **P001**

enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H<sub>2</sub>O);

- d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "b", shall be completely closed to any air movement during process operations; and
  - e. all ammonia emissions shall be captured and contained for discharge through the control device.
- 2.b.** The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the ammonia emissions from this emissions unit.
- 2.c.** The 2.23 ton per year annual emissions limit for P001 was established to reflect the actual operations described in the PTI (PTIO or PTO) application for this emissions unit during a calendar year. This calendar year emissions limitation does not reflect the potential to emit for this emissions unit and it is not a practically enforceable restriction of the potential to emit to avoid any additional permitting requirements.

## **B. Operational Restrictions**

1. The emissions from this emissions unit shall be vented to the Stage 1 (mist scrubber) and Stage 2 (packed bed scrubber) control system wet scrubber at all times the emissions unit is in operation.
2. The acceptable scrubber water makeup liquid flow rate to the Stage 1 mist scrubber shall be continuously maintained at a value of not less than 1.2 gallons per minute at all times when the emissions unit is in operation.
3. The acceptable scrubber water makeup liquid flow rate to the Stage 2 packed bed scrubber shall be continuously maintained at a value of not less than 5 gallons per minute at all times when the emissions unit is in operation.
4. The pH of both Stage 1 (mist scrubber) and Stage 2 (packed bed scrubber) liquor shall be maintained at a value of less than 3.0, as a three-hour average, while this emissions unit is in operation.
5. The permanent total enclosure shall be maintained under negative pressure, with an

**Modification Issued: 4/1/2008**

average facial velocity at each natural draft opening of 200 feet per minute (3,600 m/hr) or greater, whenever the emissions unit is in operation.

6. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor the scrubbers water flow rate (in gallons per minute), and the scrubbers liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the scrubbers liquid's pH and flow rate on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the flow rate and pH readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

**Modification Issued: 4/1/2008**

These range(s) and/or limit(s) for the liquid flow rate and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the liquid flow rate or pH based upon information obtained during future emission tests that demonstrate compliance with the allowable ammonia emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

3. The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):
  - a. the measured diameter of each natural draft opening;
  - b. the distance measured from each natural draft opening to each ammonia emitting point;
  - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
  - d. the calculation or demonstration that the distance from each ammonia emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
  - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.
4. The permittee shall perform daily inspections of the permanent total enclosure to ensure that all access doors and windows that are not natural draft openings are closed, and that the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

Using a portable air flow meter, the permittee shall perform weekly facial velocity checks at each natural draft opening to the permanent total enclosure, to determine if the average facial velocity at each opening is maintained at 200 feet per minute or greater.

Emissions Unit ID: P001

Records shall be maintained of the results of each daily inspection and the weekly air velocity measurements, and shall include any corrective actions taken by the permittee.

5. The permit to install for this emissions unit (P001 and P002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (mg/m3): 1,700

Maximum Hourly Emission Rate (lbs/hr): 1.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82.71

MAGLC (ug/m3): 170

6. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

**Modification Issued: 4/1/2008**

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the Stage 1 and Stage 2 control system during the operation of the controlled emissions unit(s):
  - a. each period of time when the liquid flow rate and/or the liquid pH was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the liquid flow rate and/or scrubber liquid pH into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit quarterly deviation (excursion) reports that specify the following information:
  - a. all periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow or air flow in a direction leaving the enclosure;
  - b. all periods of time during which an access door and/or window, not qualifying as a natural draft opening, was left open during operations; and
  - c. all weekly average facial velocity readings at natural draft openings that were less than 200 feet per minute.

**E. Testing Requirements**

Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

**1.a. Emission Limitation -**

The ammonia emissions from this emissions unit shall not exceed 0.51 lb/hour.

**Applicable Compliance Method -**

Compliance with this mass emission limitation was demonstrated during a stack test conducted on March 30, 1999 showing results of 0.29 lb/hour. If required, compliance shall be based upon additional stack testing.

**1.a. Emission Limitation:**

The ammonia emissions from this emissions unit shall not exceed 2.23 tons per year.

**Compliance Method:**

The 2.23 TPY limitation was developed by multiplying the 0.51 lb/hour allowable emission rate by a maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

**Operations, Property, and/or Equipment - (P002) - Burlap Treat Line No. 2 (Warrior)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The ammonia emissions from this emissions unit shall not exceed 0.51 pounds/hr and 2.23 tons per year (TPY).

**2. Additional Terms and Conditions**

- 2.a The permanent total enclosure shall be constructed to totally enclose the burlap treat line from the dip process to the steam drum dryers to the control device

The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

- a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
- b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
- c. the direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per

minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H<sub>2</sub>O);

- d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "b", shall be completely closed to any air movement during process operations; and
  - e. all ammonia emissions shall be captured and contained for discharge through the control device.
- 2.b.** The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the ammonia emissions from this emissions unit.
- 2.c.** The 2.23 ton per year annual emissions limit for P001 was established to reflect the actual operations described in the PTI (PTIO or PTO) application for this emissions unit during a calendar year. This calendar year emissions limitation does not reflect the potential to emit for this emissions unit and it is not a practically enforceable restriction of the potential to emit to avoid any additional permitting requirements.

## **B. Operational Restrictions**

1. The emissions from this emissions unit shall be vented to the Stage 1 (mist scrubber) and Stage 2 (packed bed scrubber) control system wet scrubber at all times the emissions unit is in operation.
2. The acceptable scrubber water makeup liquid flow rate to the Stage 1 mist scrubber shall be continuously maintained at a value of not less than 1.2 gallons per minute at all times when the emissions unit is in operation.
3. The acceptable scrubber water makeup liquid flow rate to the Stage 2 packed bed scrubber shall be continuously maintained at a value of not less than 5 gallons per minute at all times when the emissions unit is in operation.
4. The pH of both Stage 1 (mist scrubber) and Stage 2 (packed bed scrubber) liquor shall be maintained at a value of less than 3.0, as a three-hour average, while this emissions unit is in operation.

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 085704202**

5. The permanent total enclosure shall be maintained under negative pressure, with an average facial velocity at each natural draft opening of 200 feet per minute (3,600 m/hr) or greater, whenever the emissions unit is in operation.
6. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor the scrubbers water flow rate (in gallons per minute), and the scrubbers liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the scrubbers liquid's pH and flow rate on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 085704202**

- j. the flow rate and pH readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the liquid flow rate and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the liquid flow rate or pH based upon information obtained during future emission tests that demonstrate compliance with the allowable ammonia emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- 3. The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):
  - a. the measured diameter of each natural draft opening;
  - b. the distance measured from each natural draft opening to each ammonia emitting point;
  - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
  - d. the calculation or demonstration that the distance from each ammonia emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
  - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.
- 4. The permittee shall perform daily inspections of the permanent total enclosure to ensure that all access doors and windows that are not natural draft openings are closed, and that the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 085704202**

Using a portable air flow meter, the permittee shall perform weekly facial velocity checks at each natural draft opening to the permanent total enclosure, to determine if the average facial velocity at each opening is maintained at 200 feet per minute or greater.

Records shall be maintained of the results of each daily inspection and the weekly air velocity measurements, and shall include any corrective actions taken by the permittee.

5. The permit to install for this emissions unit (P001 and P002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (mg/m<sup>3</sup>): 1,700

Maximum Hourly Emission Rate (lbs/hr): 1.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 82.71

MAGLC (ug/m<sup>3</sup>): 170

6. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents,

**Dayton Bag and Burlap**  
**PTI Application: 08-03818**  
**Modification Issued: 4/1/2008**

**Facility ID: 085704202**

Biological Exposure Indices");

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the Stage 1 and Stage 2 control system during the operation of the controlled emissions unit(s):
  - a. each period of time when the liquid flow rate and/or the liquid pH was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the liquid flow rate and/or scrubber liquid pH into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit quarterly deviation (excursion) reports that specify the following information:
  - a. all periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow or air flow in a direction leaving the enclosure;
  - b. all periods of time during which an access door and/or window, not qualifying as a natural draft opening, was left open during operations; and

- c. all weekly average facial velocity readings at natural draft openings that were less than 200 feet per minute.

**E. Testing Requirements**

Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -  
The ammonia emissions from this emissions unit shall not exceed 0.51 lb/hour.  
  
Applicable Compliance Method -  
Compliance with this mass emission limitation was demonstrated during a stack test conducted on March 30, 1999 showing results of 0.29 lb/hour. If required, compliance shall be based upon additional stack testing.
- b. Emission Limitation:  
The ammonia emissions from this emissions unit shall not exceed 2.23 tons per year.  
  
Compliance Method:  
The 2.23 TPY limitation was developed by multiplying the 0.51 lb/hour allowable emission rate by a maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

**F. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-03818 Facility ID: 0857042020

FACILITY NAME Dayton Bag and Burlap

FACILITY DESCRIPTION Administrative modification to correct CITY/TWP Davton

Emissions Unit ID: P002

SIC CODE 2393 SCC CODE 3-30-001-99 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION Burlap Treat Line No. 1 (The Chief)

DATE INSTALLED 09/90

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	ammonia	0.51 lbs/hr	2.23 TPY	0.51 lbs/hr	2.23 TPY

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** BAT is compliance with applicable OAC rule and specified allowable emission limitations through the use of a scrubber control system; compliance with Ohio EPA Air Toxic Policy; monitoring and record keeping and reporting.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes  
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: Ammonia

