



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/21/03

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

01-80-01-0008
The Scotts Co.
Mike Black
14111 Scottslawn Road
Marysville, OH 43041

Dear Mike Black:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Central District Office.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Central District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 05/21/03	Effective Date: 06/11/03	Expiration Date: 06/11/08
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This document constitutes issuance of a Title V permit for Facility ID: 01-80-01-0008 to:
The Scotts Co.
14111 Scottslawn Road
Marysville, OH 43041

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P014 (Polymer Encapsulation System) Raw material system: hopper, elevator, screen, surge bin and feeder	System MAP Product recovery receiver bin	P047 (System #4, Resin Reactor #1) Resin reactor vessel
P015 (Fluid Bed Coater) Polymer encapsulation, fluid bed coater	P031 (Poly-S Packaging and Blending System) Elevators, screens, surge bins, conveyors	P048 (System 4-Resin Reactor #2) Resin reactor vessel
P016 (Raw Material Receiving and Storage) Conveyors, elevator, storage bunker	P033 (Poly-S Air Slide Cooler) Air slide cooler	P049 (System 4- Granulator and process cooler) granulation drum and process cooler
P017 (Raw Material Batching) Hopper, elevators, bins, conveyor, scale, screen	P036 (System 2 Granulation Drum & Process Cooler) System II granulation drum & process cooler (a separate stack for each piece of equipment)	P050 (System 4- Packaging Operations) packaging operations
P018 (Blending and Packaging) Rotary drum blender, screen, surgebin, bagging scales	P037 (System 3 Resin Reactor No. 1) reactor vessel	P051 (System 4- Product Handling) mills, elevators, screens, conveyors
P019 (Pesticide Blending and Packaging) Screen, surge bin, bagging scales	P038 (System 3 Resin Reactor No. 2) reactor vessel	P052 (System 4-Blending) Blending vessel
P020 (BB Pest Mix Tanks) Bulk Blend Pesticide Mix Tanks with carbon adsorber	P040 (System 3 Granulation Drum and Process Cooler) granulation drum and process cooler	P067 (BB Pest Blender) Bulk Blend Pesticide Blending Vessel w/fabric filter and carbon
P022 (Poly-S Urea Unloading System) Bucket elevator and transfer belt	P041 (System 3 Product Handling) screens, mills, conveyors and elevators	P068 (BB Drum Handling) Bulk Blend Drum Handling, Storage and transfer operations with vented hood and carbon adsorber
P023 (Poly-S Urea Storage, Sizing and Feed System) Elevators, conveyors, screens, storage bins, surge bins	P042 (System 3 Product Blending) Blending equipment	P071 (SYS 2 Raw Material & Product Handling) System 2 Raw Materials and Product Handling, Milling, screening, with baghouse
P024 (Poly-S Fluid Bed Urea Preheater System) Fluid bed urea preheater	P043 (System 1,2 and 3 Packaging) System 1,2 and 3 Packaging with Fabric Filter	P102 (Spreader Test Area) Physical quality check of production material, Analytical Lab
P025 (Poly-S Sulfur Coating System) Sulfur coating drum	P044 (System 4- Monamonimum phosphate, potash & verm. system) System 4 raw material handling for mon-a-mon, vermiculite and potash.	P103 (Pilot Plant Equipment) Pilot plant process. R&D activity for small scale production of fertilizer products.
P026 (Poly-S Polymer Top Coating System) Polymer top coating drum	P045 (System 4-Raw Material Handling Handling System) System 4 Material handling/unloading forurea, monammonimum phosphate, KCl, limestone and chloride	P104 (Pilot Plant Resin Phase) Kettles and Feeders
P027 (Poly-S P/K Unloading System) Bucket elevator, transfer conveyor	P046 (System 4- Urea Handling/Unloading) System 4 urea unloading/handling system	P105 (Central Vacuum System (Systems 1 and 2)) Mixed fertilizer vacuum for point pickup
P028 (Poly-S P/K Storage and Feed System) Elevators, screen, conveyors, storage bins, surge bins		P109 (Combination Products System #1) Pesticide melting and mixing
P029 (Poly-S MAP Off-Size Product Recovery		

P110 (Dry Chemical Processing)
Ferrous sulfate handling system

P113 (System 2 Resin Kettles)
Resin phase for fertilizer production.

P115 (Control Products - Pesticide Process)
kettles

P134 (Mon-A-Mon, Potash & Vermiculite Ore
Unloading)
Raw Material Unloading system

P138 (MURP Granulation Drum)
System 1, MURP granulation drum

P139 (Resin Reactor System)
System 1 resin reactor system

P140 (Product Milling & Screening)
System 1 product milling and screening

P141 (Product Cooler)
System 1 product cooler

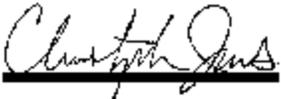
T012 (Bifenthrin Storage Tank)
16,400 gallon bifenthrin pesticide storage tank

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. The permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
 - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six

months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- iv. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

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 of any emissions unit(s) 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. Except as provided in OAC rule 3745-15-06, 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 emissions unit(s) that is (are) served by such control system(s).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.
(Authority for term: OAC rule 3745-77-07(A)(5))

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. 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, reopening 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 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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., 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.)

2. Records Retention Requirements

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.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. 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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B102 - #2 warehouse (west) space heater
B103 - #2 warehouse (east) space heater
B106 - pesticide process heater
B109 - trionized boiler #4
B110 - trionized boiler #1
G101 - gasoline dispensing facility
F001 - plant roadways
P013 - urea handling system
T001 - UFC #1
T002 - UFC #2
T003 - UFC #3
T004 - UFC #4
T005 - UFC #5
T006 - hexylene glycol #1
T007 - hexylene glycol #2
T008 - polyvis #1
T009 - polyvis #2
T010 - sulfuric acid tank
T011 - solvac tank

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Polymer Encapsulation System (P014)

Activity Description: Raw material system: hopper, elevator, screen, surge bin and feeder

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
polymer encapsulation system with hopper, elevator, screen, surge bin and feeder, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-3601)	Particulate emissions from the baghouse stack shall not exceed 0.02 pound per hour. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the hopper, elevator, screen, surge bin and feeder to the baghouse controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Particulate emissions from the baghouse stack shall not exceed 0.02 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Fluid Bed Coater (P015)
Activity Description: Polymer encapsulation, fluid bed coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
polymer encapsulation fluid bed coater without controls	OAC rule 3745-31-05(A)(3) (PTI 01-3601)	Particulate emissions from the stack shall not exceed 1.86 pounds per hour.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack of this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
Particulate emissions shall not exceed 1.86 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly particulate emission rate may be determined by multiplying the maximum hourly production of the process of 0.75 ton per hour by an emission factor of 0.2 lb particulates per ton of raw material (RACM for Fertilizer Mixing/Blending Plants, Table 2.12-1, 1983). The resulting uncontrolled emission rate shall be multiplied by the assumed baghouse control efficiency of 99% (1-.99) to obtain the controlled hourly particulate emission rate.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Raw Material Receiving and Storage (P016)

Activity Description: Conveyors, elevator, storage bunker

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
raw material receiving and storage including conveyors, elevator, and storage bunker, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-3601)	Particulate emissions from the baghouse stack shall not exceed 0.2 pound per hour.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from each conveyor, elevator, and storage bunker to the baghouse controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Particulate emissions from the baghouse stack shall not exceed 0.2 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Raw Material Batching (P017)
Activity Description: Hopper, elevators, bins, conveyor, scale, screen

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
raw material batching including hopper, elevators, bins, conveyor, scale, and screen, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-3601)	Particulate emissions from the baghouse stack shall not exceed 0.10 pound per hour.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the hopper, elevators, bins, conveyor, scale, and screen to the baghouse controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Particulate emissions from the baghouse stack shall not exceed 0.10 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Blending and Packaging (P018)

Activity Description: Rotary drum blender, screen, surgebin, bagging scales

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotary drum blender, screen, surge bin, and bagging scales, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-3601)	Particulate emissions from the baghouse stack shall not exceed 0.05 pound per hour.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the rotary drum blender, screen, surge bin, and bagging scales to the baghouse controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Particulate emissions from the baghouse stack shall not exceed 0.05 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pesticide Blending and Packaging (P019)

Activity Description: Screen, surge bin, bagging scales

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pesticide blending and packaging with rotary drum blender, screens, surge bin, and bagging scales, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-3601)	Particulate emissions from the baghouse stack shall not exceed 0.05 pound per hour. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the rotary drum blender, screens, surge bin, and bagging scales to the baghouse controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Particulate emissions from the baghouse stack shall not exceed 0.05 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BB Pest Mix Tanks (P020)
Activity Description: Bulk Blend Pesticide Mix Tanks with carbon adsorber

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
bulk blend pesticide mix tanks, vented to a carbon adsorber	OAC rule 3745-31-05(A)(3) (PTI 01-8386)	Organic compound (OC) emissions from the carbon adsorber stack shall not exceed 1.3 pounds per hour and 6.0 tons per year. See A.III.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a OC emissions shall not exceed 30.2 tons per rolling, 12-month period from emissions units P067, P068, and P020 combined.
- 2.b The permittee shall vent all the OC emissions to the carbon adsorber at all times the emissions unit is in operation.

II. Operational Restrictions

1. The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (i.e., 1.04 pounds/hour or 55 ppm).
2. The permittee shall operate the carbon adsorber whenever the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total production rate of P020, in tons;
 - b. the total OC emissions for emissions unit P020 using the following equation:
(OC emission rate established by the testing required in Section A.V.1.a, in pounds OC per ton of production) x
(the production rate of P020 required by A.III.1.a above); and
 - c. the rolling, 12-month summation of OC emissions for emissions units P067, P068, and P020 combined, in tons, calculated by summing the total OC emissions for each emissions unit recorded in Section A.III.1.b.
2. The permittee shall properly operate and maintain equipment to monitor the outlet gases from the carbon adsorber when the emissions unit is in operation. The equipment shall meet the specifications and performance criteria of Section 6.0 of Method 21 (40 CFR Part 60, Appendix A) to be considered a compliant monitoring device. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month bifenthrin is being blended, the permittee shall collect and record the following information on a biweekly basis (twice per month):

- a. the OC concentration of the outlet gas from the carbon adsorber, in ppm (the permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device measures several different concentrations);
 - b. the production rate of the emissions unit at the time the OC concentration is recorded, in tons/hour, for the purpose of ensuring that the OC concentration is recorded at or near normal operating conditions; and
 - c. if the maximum concentration exceeded 55 ppm, a record indicating the date and time the activated carbon was replaced.
3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #01-08386, issued on October 23, 2001: Paragraphs A.III.1. and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation for emissions units P067, P068 and P020 combined. These reports shall be submitted on the dates specified in paragraph A.1.c.ii. of the General Terms and Conditions.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all days in which the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm. The reports shall also include each day the activated carbon was replaced. These reports shall be submitted on the dates specified in paragraph A.1.c.ii. of the General Terms and Conditions.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
OC emissions from the carbon adsorber stack shall not exceed 1.3 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly OC limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the startup of this emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-4 and 25A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

- 1.b** Emission Limitation:
OC emissions from the carbon adsorber stack shall not exceed 6.0 tons per year.

Applicable Compliance Method:

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- 1.c** Emission Limitation:
OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067, P068 and P020 combined.

Applicable Compliance Method:

Compliance shall be demonstrated through the records required pursuant to Section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S Urea Unloading System (P022)

Activity Description: Bucket elevator and transfer belt

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Poly-S urea unloading system including bucket elevator and transfer belt, vented to a bin vent	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	<p>Particulate emissions from the bin vent stack shall not exceed 0.04 pound per hour and 0.13 ton per year.</p> <p>PM10 emissions from the bin vent stack shall not exceed 0.04 pound per hour and 0.13 ton per year.</p> <p>Fugitive particulate emissions shall not exceed 2.5 pounds per hour and 1.3 tons per year.</p> <p>Fugitive PM10 emissions shall not exceed 1.45 pounds per hour and 0.75 ton per year.</p> <p>The bin vent filter shall achieve an outlet emission rate of not greater than 0.006 grain of particulate emissions per dry standard cubic foot of exhaust gases.</p> <p>The bin vent filter shall achieve an outlet emission rate of not greater than 0.006 grain of PM10 emissions per dry standard cubic foot of exhaust gases.</p> <p>There shall be no visible particulate emissions from the bin vent stack.</p> <p>Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c** The short term limitations of 2.5 pounds fugitive particulate emissions per hour and 1.45 pounds fugitive PM10 emissions per hour were established to reflect the maximum hourly potentials to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d** The permittee shall vent the particulate emissions from the unloading area, bucket elevator and transfer belt to the bin vent controlling this emissions unit.

II. Operational Restrictions

- 1.** The permittee shall operate the bin vent whenever this emissions unit is in operation.
- 2.** The permittee shall maintain a partial enclosure of the belt conveyor and bucket elevator while this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible fugitive emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain monthly records of the total operating hours for this emissions unit.
4. The permittee shall maintain annual records of the operating hours of this emissions unit as a summation of the monthly operating hours.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit annual reports that include the following:
 - a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the bin vent stack shall not exceed 0.04 pound per hour.

PM10 emissions from the bin vent stack shall not exceed 0.04 pound per hour.

The bin vent filter shall achieve an outlet emission rate of not greater than 0.006 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The bin vent filter shall achieve an outlet emission rate of not greater than 0.006 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the hourly particulate and PM10 emission limitations may be demonstrated by using the following equation:

$(\text{controlled emission rate of baghouse of } 0.006 \text{ grain of particulate or PM}_{10}/\text{SCF}^*) \times (\text{maximum exhaust gas velocity of } 700 \text{ SCF}/\text{min}^*) \times (60 \text{ minutes}/\text{hour}) \times (1 \text{ pound}/7000 \text{ grains})$

* Data supplied by The Scotts Company in the permit to install application for this emissions unit submitted to Ohio EPA on July 14, 1995.

If required, the permittee shall demonstrate compliance with the grain loading and hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

1.b Emission Limitations:

Particulate emissions from the bin vent stack shall not exceed 0.13 ton per year.

PM10 emissions from the bin vent stack shall not exceed 0.13 ton per year.

Applicable Compliance Method:

Compliance with the annual particulate emission limitations may be determined by multiplying the hourly emission limitation specified in Section A.V.1.a above by the actual operating hours per year recorded in Section A.III.4 above and dividing by 2,000 pounds/ton.

V. Testing Requirements (continued)

- 1.c** Emission Limitations:
Fugitive particulate emissions shall not exceed 2.5 pounds per hour.

Fugitive PM10 emissions shall not exceed 1.45 pounds per hour.

Applicable Compliance Method:

Compliance with the above fugitive particulate hourly emission limitations may be determined by multiplying the maximum hourly urea unloading rate of 50 tons per hour by the appropriate emission factor listed in the table below. The resulting emission rate shall be multiplied by the assumed building control efficiency of 90% (1-0.9) (based on RACM for Material Handling, Table 2.1.3-3, 1983) to obtain the maximum hourly emissions.

Pollutant	Emission Factor
Particulate	0.5 lb particulate/ton material unloaded(1)
PM10	0.29 lb PM10 / ton material unloaded(2)

(1) Particulate emission factor submitted by The Scotts Company in the PTI 01-5928 application submitted to Ohio EPA, CDO on July 14, 1995.

(2) PM10 emission factor specified in USEPA reference document AP-42, Table 8.5.1-1 for superphosphate unloading (7/93).

- 1.d** Emission Limitations:
Fugitive particulate emissions shall not exceed 1.3 tons per year.

Fugitive PM10 emissions shall not exceed 0.75 ton per year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the maximum annual urea unloading rate of 52,000 tons per year by the appropriate emission factor listed in the table in Section A.V.1.c above. The resulting emission rate was multiplied by an estimated building control efficiency of 90% (1-0.9). The controlled emission rate was then divided by 1 ton per 2,000 lbs to obtain the annual emissions.

- 1.e** Emission Limitation:
There shall be no visible particulate emissions from the bin vent stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

- 1.f** Emission Limitation:
Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S Urea Storage, Sizing and Feed System (P023)
Activity Description: Elevators, conveyors, screens, storage bins, surge bins

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Poly-S urea storage, sizing and feed system including elevators, conveyors, screens, storage bins, and surge bins, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	<p>Particulate emissions from the baghouse stack shall not exceed 0.27 pound per hour and 1.0 ton per year.</p> <p>PM10 emissions from the baghouse stack shall not exceed 0.44 pound per hour and 1.62 tons per year.</p> <p>The baghouse shall achieve an outlet emission rate of not greater than 0.002 grain of particulate emissions per dry standard cubic foot of exhaust gases.</p> <p>The baghouse shall achieve an outlet emission rate of not greater than 0.003 grain of PM10 emissions per dry standard cubic foot of exhaust gases.</p> <p>There shall be no visible particulate emissions from the baghouse stack.</p>
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c** The permittee shall vent the particulate emissions from the elevators, conveyors, screens, storage bins, and surge bins to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- 2. The permittee shall maintain monthly records of the operating hours for this emissions unit.
- 3. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 2. The permittee shall submit annual reports that include the following:
 - a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitations:
Particulate emissions from the baghouse stack shall not exceed 0.27 pound per hour.

PM10 emissions from the baghouse stack shall not exceed 0.44 pound per hour.

The baghouse shall achieve an outlet emission rate of not greater than 0.002 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The baghouse shall achieve an outlet emission rate of not greater than 0.003 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the grain loading and hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for this emissions unit on April 25, May 11 and May 12, 1995. The emissions test demonstrated compliance with the hourly emission limitations and the grain loading limitations for this emissions unit.

- 1.b Emission Limitations:
Particulate emissions from the baghosue stack shall not 1.0 ton per year.

PM10 emissions from the baghouse stack shall not exceed 1.62 ton per year.

Applicable Compliance Method:

The annual particulate and PM10 emission limitations may be determined by multiplying the hourly emission rates established by the April 25 and May 11, 1995 stack tests (0.27 pound per hour for particulate and 0.4 pound per hour for PM10) or the most recent emission test that demonstrated the emission unit was in compliance by the actual number of operating hours recorded in Section A.III.3 above and dividing by 2,000 pounds per ton to obtain the annual emissions.

- 1.c Emission Limitation:
There shall be no visible particulate emissions from the baghouse stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S Fluid Bed Urea Preheater System (P024)

Activity Description: Fluid bed urea preheater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Poly-S fluid bed urea preheater vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	<p>Particulate emissions from the baghouse stack shall not exceed 0.05 pound per hour and 0.19 ton per year.</p> <p>PM10 emissions from the baghouse stack shall not exceed 0.05 pound per hour and 0.19 ton per year.</p> <p>The baghouse shall achieve an outlet emission rate of not greater than 0.001 grain of particulate emissions per dry standard cubic foot of exhaust gases.</p> <p>The baghouse shall achieve an outlet emission rate of not greater than 0.001 grain of PM10 emissions per dry standard cubic foot of exhaust gases.</p> <p>There shall be no visible particulate emissions from the baghouse stack.</p>
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The permittee shall vent all the particulate emissions to the baghouse whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall maintain monthly records of the operating hours for this emissions unit.
3. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports that include the following:
- a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.05 pound per hour.

PM10 emissions from the baghouse stack shall not exceed 0.05 pound per hour.

The baghouse shall achieve an outlet emission rate of not greater than 0.001 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The baghouse shall achieve an outlet emission rate of not greater than 0.001 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the hourly particulate and PM10 emission limitations may be demonstrated by using the following equation:

(controlled emission rate of baghouse of 0.001 grain of particulate or PM10/SCF*) x (maximum exhaust gas velocity of 6,000 SCF/min*) x (60 minutes/hour) x (1 pound/7000 grains*)

* Data supplied by The Scotts Company in the permit to install application for this emissions unit submitted to Ohio EPA July 14, 1995.

If required, the permittee shall demonstrate compliance with the grain loading and hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 4 and Method 5 for particulate and Methods 201 or 201A for PM10. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

1.b Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.19 ton per year.

PM10 emissions from the baghouse stack shall not exceed 0.19 ton per year.

Applicable Compliance Method:

Compliance with the annual particulate emission may be determined by multiplying the hourly emission limitation specified in Section A.V.1.a above by the actual hours of operation per year recorded in Section A.III.3 above and dividing by 2,000 pounds/ton.

1.c Emission Limitation:

There shall be no visible particulate emissions from the baghouse stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S Sulfur Coating System (P025)
Activity Description: Sulfur coating drum

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sulfur coating drum vented to a cyclone and cyclonic scrubber	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	Particulate emissions from the scrubber stack shall not exceed 0.31 pound per hour and 1.15 tons per year. PM10 emissions rom the scrubber stack shall not exceed 0.15 pound per hour and 0.54 ton per year. The scrubber shall achieve an outlet emission rate of not greater than 0.02 grain of particulate emissions per dry standard cubic foot of exhaust gases. The scrubber shall achieve an outlet emission rate of not greater than 0.007 grain of PM10 emissions per dry standard cubic foot of exhaust gases.
	OAC rule 3745-17-07(A)	There shall be no visible particulate emissions from the scrubber stack. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The permittee shall vent all the particulate emissions to the cyclone and cyclonic scrubber whenever this emissions unit is in operation.

II. Operational Restrictions

- The permittee shall operate the cyclone and cyclonic scrubber whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall maintain monthly records of the operating hours for this emissions unit.
3. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports that include the following:
 - a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitations:
Particulate emissions from the scrubber stack shall not exceed 0.31 pound per hour.

PM10 emissions from the scrubber stack shall not exceed 0.15 pound per hour.

The scrubber shall achieve an outlet emission rate of not greater than 0.02 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The scrubber shall achieve an outlet emission rate of not greater than 0.007 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.

Emissions testing was conducted for this emissions unit on April 25 and May 11, 1995. The emissions test demonstrated compliance with the emissions limitations for this emissions unit.

- 1.b Emission Limitations:
Particulate emissions from the scrubber stack shall not exceed 1.15 tons per year.

PM10 emissions from the scrubber stack shall not exceed 0.54 ton per year.

Applicable Compliance Method:

Compliance with the annual particulate and PM10 emission limitations may be determined by multiplying the hourly emission rates established by the April 25 and May 11, 1995 stack tests (0.31 pound per hour for particulate and 0.13 pound per hour for PM10) or by the most recent emission test that demonstrated the emissions unit was in compliance, by the actual number of operating hours per year recorded in Section A.III.3 above, and dividing by 2,000 pounds per ton.

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
There shall be no visible particulate emissions from the stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S Polymer Top Coating System (P026)

Activity Description: Polymer top coating drum

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
polymer top coating feed and drum, vented to a cyclone	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	Particulate emissions from the cyclone stack shall not exceed 1.34 pounds per hour and 4.9 tons per year. PM10 emissions from the cyclone stack shall not exceed 1.97 pounds per hour and 7.21 tons per year. The cyclone shall achieve an outlet emission rate of not greater than 0.007 grain of particulate emissions per dry standard cubic foot of exhaust gases. The cyclone shall achieve an outlet emission rate of not greater than 0.009 grain of PM10 emissions per dry standard cubic foot of exhaust gases.
	OAC rule 3745-17-07(A)	There shall be no visible particulate emissions from the cyclone stack. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The permittee shall vent all the particulate emissions to the cyclone whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the cyclone whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall maintain monthly records of the operating hours for this emissions unit.
3. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports which include the following:
- a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the stack shall not exceed 1.34 pounds per hour.

PM10 emissions from the stack shall not exceed 1.97 pounds per hour.

The cyclone shall achieve an outlet emission rate of not greater than 0.007 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The cyclone shall achieve an outlet emission rate of not greater than 0.009 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the grain loading and hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for this emissions unit on May 23 and 24, 1995. The emissions test demonstrated compliance with the emission limitations for this emissions unit.

1.b Emission Limitations:

Particulate emissions from the stack shall not exceed 4.9 tons per year.

PM10 emissions from the stack shall not exceed 7.21 tons per year.

Applicable Compliance Method:

Compliance with the annual particulate and PM10 emission limitations may be determined by multiplying the hourly emission rates established by the May 23 and 24, 1995 stack test (1.2 pounds per hour for particulate and 1.87 pounds per hour for PM10) or by the most recent emission test that demonstrated the emissions unit was in compliance, by the actual number of operating hours per year recorded in Section A.III.3 above, and dividing by 2,000 pounds per ton.

1.c Emission Limitation:

There shall be no visible particulate emissions from the stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S P/K Unloading System (P027)

Activity Description: Bucket elevator, transfer conveyor

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Poly-S unloading system including unloading bucket, elevator, and transfer conveyor, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	<p>Particulate emissions from the baghouse stack shall not exceed 0.04 pound per hour and 0.13 ton per year.</p> <p>PM10 emissions from the baghouse stack shall not exceed 0.04 pound per hour and 0.13 ton per year.</p> <p>Fugitive particulate emissions shall not exceed 2.50 pounds per hour and 0.54 ton per year.</p> <p>Fugitive PM10 emissions shall not exceed 1.45 pounds per hour and 0.31 ton per year.</p> <p>The baghouse shall achieve an outlet emission rate of not greater than 0.006 grain of particulate emissions per dry standard cubic foot of exhaust gases.</p> <p>The baghouse shall achieve an outlet emission rate of not greater than 0.006 grain of PM10 emissions per dry standard cubic foot of exhaust gases.</p> <p>There shall be no visible particulate emissions from the baghouse stack.</p> <p>Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c** The permittee shall vent the particulate emissions from the unloading bucket, elevator, and transfer conveyor to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain monthly records of the operating hours for this emissions unit.
4. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit annual reports that include the following:
 - a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.04 pound per hour.

PM10 emissions from the baghouse stack shall not exceed 0.04 pound per hour.

The baghouse shall achieve an outlet emission rate of not greater than 0.006 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The baghouse shall achieve an outlet emission rate of not greater than 0.006 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the hourly particulate and PM10 emission limitations may be demonstrated by using the following equation:

$(\text{controlled emission rate of baghouse of } 0.006 \text{ grain of particulate or PM}_{10}/\text{SCF}^*) \times (\text{maximum exhaust gas velocity of } 700 \text{ SCF}/\text{min}^*) \times (60 \text{ minutes}/\text{hour}) \times (1 \text{ pound}/7000 \text{ grains})$

* Data supplied by The Scotts Company in the permit to install application for this emissions unit submitted to Ohio EPA on July 14, 1995.

If required, the permittee shall demonstrate compliance with the grain loading and hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test.

Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

1.b Emission Limitations:

Particulate emissions from the stack shall not exceed 0.13 ton per year.

PM10 emissions from the stack shall not exceed 0.13 ton per year.

Applicable Compliance Method:

Compliance with the annual particulate emission limitations may be determined by multiplying the above hourly emission limitations specified in Section A.V.1.a. by the actual hours of operation per year recorded in Section A.III.4 above and dividing by 2,000 pounds/ton.

V. Testing Requirements (continued)

1.c Emission Limitations:

Fugitive particulate emissions shall not exceed 2.50 pounds per hour and 0.54 ton per year.

Fugitive PM10 emissions shall not exceed 1.45 pounds per hour and 0.31 ton per year.

Applicable Compliance Method:

Compliance with the above hourly emissions limitations shall be determined by multiplying the maximum hourly urea unloading rate (50 tons) by the appropriate emission factor listed in the table below. The resulting emission rate shall be multiplied by 90% (1-0.9) capture efficiency of the building (based on RACM for Material Handling, Table 2.1.3-3, 1983) to obtain the maximum hourly emissions.

The annual emission limitations were established by multiplying the maximum annual urea unloading rate of 21,500 tons per year by the appropriate emission factor listed in the table below. The resulting emission rate was multiplied by 90% (1-0.9) capture efficiency of the building and divided by 1 ton per 2,000 lbs.

Pollutant	Emission Factor
Particulate	0.5 lb particulate/ton material unloaded(1)
PM10	0.29 lb PM10 / ton material unloaded(2)

(1) Particulate emission factor submitted by The Scotts Company in the PTI 01-5928 application submitted to Ohio EPA, CDO on July 14, 1995.

(2) PM10 emission factor specified in USEPA reference document AP-42, Table 8.5.1-1 for superphosphate unloading (7/93).

1.d Emission Limitation:

There shall be no visible particulate emissions from the baghouse stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.e Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S P/K Storage and Feed System (P028)
Activity Description: Elevators, screen, conveyors, storage bins, surge bins

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Poly-S P/K storage and feed system including elevators, screen, conveyors, storage and surge bins, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	Particulate emissions from the baghouse stack shall not exceed 0.46 pound per hour and 0.63 ton per year.
		PM10 emissions from the baghouse stack shall not exceed 1.24 pounds per hour and 1.7 tons per year.
		The baghouse shall achieve an outlet emission rate of not greater than 0.003 grain of particulate emissions per dry standard cubic foot of exhaust gases.
		The baghouse shall achieve an outlet emission rate of not greater than 0.008 grain of PM10 emissions per dry standard cubic foot of exhaust gases.
	OAC rule 3745-17-07(A)	There shall be no visible particulate emissions from the baghouse stack.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c** The permittee shall vent the particulate emissions from the elevators, screen, conveyors, and storage and surge bins to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

- 2. The permittee shall maintain monthly records of the operating hours for this emissions unit.
- 3. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which include the following:
 - a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.46 pound per hour.

PM10 emissions from the baghouse stack shall not exceed 1.24 pounds per hour.

The baghouse shall achieve an outlet emission rate of not greater than 0.003 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The baghouse shall achieve an outlet emission rate of not greater than 0.008 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Emissions testing was conducted for this emissions unit on April 26, May 12 and 23, 1995. The emissions test demonstrated compliance with the emissions limitations for this emissions unit.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- 1.b Emission Limitations:

Particulate emissions from the stack shall not exceed 0.63 ton per year.

PM10 emissions from the stack shall not exceed 1.7 tons per year.

Applicable Compliance Method:

Compliance with the annual particulate and PM10 emission limitations may be demonstrated by multiplying the hourly emission rates established by the April 26, May 12 and 23, 1995 stack tests (0.47 pound per hour for particulates and 1.15 pounds per hour for PM10) or the by most recent emission test that demonstrated the emissions unit was in compliance, by the actual number of operating hours per year recorded in Section A.III.3 above, and dividing by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emission Limitation:
There shall be no visible particulate emissions from the stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S MAP Off-Size Product Recovery System (P029)

Activity Description: MAP Product recovery receiver bin

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Poly-S MAP off-size product recovery receiver bin, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	Particulate emissions from the baghouse stack shall not exceed 0.05 pound per hour and 0.19 ton per year.
		PM10 emissions from the baghouse stack shall not exceed 0.05 pound per hour and 0.19 ton per year.
		The baghouse shall achieve an outlet emission rate of not greater than 0.006 grain of particulate emissions per dry standard cubic foot of exhaust gases.
		The baghouse shall achieve an outlet emission rate of not greater than 0.006 grain of PM10 emissions per dry standard cubic foot of exhaust gases.
	OAC rule 3745-17-07(A)	There shall be no visible particulate emissions from the baghouse stack.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall vent all the particulate emissions to the baghouse whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

2. The permittee shall maintain monthly records of the operating hours for this emissions unit.
3. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports that include the following:
- a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.05 pound per hour. PM10 emissions from the baghouse stack shall not exceed 0.05 pound per hour.

The baghouse shall achieve an outlet emission rate of not greater than 0.006 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The baghouse shall achieve an outlet emission rate of not greater than 0.006 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the hourly particulate and PM10 emission limitations may be demonstrated by using the following equation:

$(\text{controlled emission rate of baghouse of } 0.006 \text{ grain of particulate or PM10/SCF}^*) \times (\text{maximum exhaust gas velocity of } 1,000 \text{ SCF/min}^*) \times (60 \text{ minutes/hour}) \times (1 \text{ pound}/7000 \text{ grains}^*) = 0.05 \text{ lb/hr}$

* Data supplied by The Scotts Company in the permit to install application for this emissions unit submitted to Ohio EPA July 14, 1995.

If required, the permittee shall demonstrate compliance with the grain loading and hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

1.b Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.19 ton per year.

PM10 emissions from the baghouse stack shall not exceed 0.19 ton per year.

Applicable Compliance Method:

Compliance with the annual particulate emission may be determined by multiplying the emission limitation specified in Section A.V.1.a above by the actual operating hours per year recorded in Section A.III.3 and dividing by 2,000 pounds per ton.

1.c Emission Limitation:

There shall be no visible particulate emissions from the baghouse stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S Packaging and Blending System (P031)

Activity Description: Elevators, screens, surge bins, conveyors

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
packaging and blending system including elevators, screens, surge bins, and conveyors, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	<p>Particulate emissions from the baghouse stack shall not exceed 0.52 pound per hour and 1.9 tons per year.</p> <p>PM10 emissions from the baghouse stack shall not exceed 1.01 pounds per hour and 3.7 tons per year.</p> <p>The baghouse shall achieve an outlet emission rate of not greater than 0.004 grain of particulate emissions per dry standard cubic foot of exhaust gases.</p> <p>The baghouse shall achieve an outlet emission rate of not greater than 0.007 grain of PM10 emissions per dry standard cubic foot of exhaust gases.</p> <p>There shall be no visible particulate emissions from the baghouse stack.</p>
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-17-07(B)

See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c** The permittee shall vent the particulate emissions from the elevators, screens, surge bins, and conveyors to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

- 2. The permittee shall maintain monthly records of the operating hours for this emissions unit.
- 3. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 2. The permittee shall submit annual reports that include the following:
 - a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.52 pound per hour.

PM10 emissions from the baghouse stack shall not exceed 1.01 pounds per hour.

The baghouse shall achieve an outlet emission rate of not greater than 0.004 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The baghouse shall achieve an outlet emission rate of not greater than 0.007 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5 and Method 201 or 201A and the procedures specified in OAC rule 3745-17-03(B)(9). Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for this emissions unit on May 18 and 19, 1995. The emissions test demonstrated compliance with the emission limitations for this emissions unit.

- 1.b Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 1.9 tons per year.

PM10 emissions from the baghouse stack shall not exceed 1.01 tons per year.

Applicable Compliance Method:

Compliance with the annual particulate and PM10 emission limitations may be demonstrated by multiplying the hourly emission rates established by the April 25 and May 11, 1995 stack tests (0.5 lb/hr for particulate and 1.01 lb/hr for PM10) or by the most recent emission test that demonstrated the emissions unit was in compliance, by the actual number of operating hours per year recorded in Section A.III.3 above, and dividing by 2,000 pounds per ton.

- 1.c Emission Limitation:

There shall be no visible particulate emissions from the baghouse stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Poly-S Air Slide Cooler (P033)

Activity Description: Air slide cooler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
air slide cooler vented to a cyclone	OAC rule 3745-31-05(A)(3) (PTI 01-5928)	Particulate emissions from the cyclone stack shall not exceed 0.49 pound per hour and 1.8 tons per year. PM10 emissions from the cyclone stack shall not exceed 0.49 pound per hour and 1.8 tons per year. The cyclone shall achieve an outlet emission rate of not greater than 0.025 grain of particulate emissions per dry standard cubic foot of exhaust gases. The cyclone shall achieve an outlet emission rate of not greater than 0.025 grain of PM10 emissions per dry standard cubic foot of exhaust gases.
	OAC rule 3745-17-07(A)	There shall be no visible particulate emissions from the cyclone stack. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The permittee shall vent all the particulate emissions to the cyclone whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the cyclone whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

2. The permittee shall maintain monthly records of the operating hours for this emissions unit.
3. The permittee shall maintain annual records of the operating hours of this emissions unit, i.e., the summation of the monthly operating hours.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports that include the following:
- a. the annual operating hours; and
 - b. the annual particulate and PM10 emission rates.

These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emissions Limitations:

Particulate emissions from the cyclone stack shall not exceed 0.49 pound per hour.

PM10 emissions from the cyclone stack shall not exceed 0.49 pound per hour.

The cyclone shall achieve an outlet emission rate of not greater than 0.025 grain of particulate emissions per dry standard cubic foot of exhaust gases.

The cyclone shall achieve an outlet emission rate of not greater than 0.025 grain of PM10 emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the hourly particulate and PM10 emission limitations may be demonstrated by using the following equation:

$(\text{controlled emission rate of baghouse of } 0.025 \text{ grain of particulate or PM10/SCF}^*) \times (\text{maximum exhaust gas velocity of } 2,300 \text{ SCF/min}^*) \times (60 \text{ minutes/hour}) \times (1 \text{ pound}/7000 \text{ grains}) = 0.49 \text{ lb/hr}$

* Data supplied by The Scotts Company in the permit to install application for this emissions unit submitted to Ohio EPA July 14, 1995.

If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

1.b Emission Limitations:

Particulate emissions from the cyclone stack shall not exceed 1.8 tons per year.

PM10 emissions from the cyclone stack shall not exceed 1.8 tons per year.

Applicable Compliance Method:

Compliance with the annual particulate and PM10 emission limitations may be determined by multiplying the emission limitation specified in Section A.V.1.a above by the actual operating hours per year recorded in Section A.III.3 and dividing by 2,000 pounds per ton.

1.c Emission Limitation:

There shall be no visible particulate emissions from the cyclone stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 2 Granulation Drum & Process Cooler (P036)

Activity Description: System II granulation drum & process cooler (a separate stack for each piece of equipment)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 2 granulation drum & process cooler, each vented to two separate baghouses	OAC rule 3745-31-05(A)(3) (PTI-01-8436)	Particulate emissions (PE) from both baghouse stacks combined shall not exceed 3.5 pounds per hour and 15.3 tons per year. PE less than 10 microns (PM10) shall not exceed 2.6 pounds per hour and 11.4 tons per year. PE from each baghouse shall not exceed 0.005 grain/scf. There shall be no visible fugitive particulate emissions escaping from the building housing this emissions unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)	See A.II.1. below. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to doorways, windows, and roof monitors.
- 2.b Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d The permittee shall vent the particulate emissions from the granulation drum and process cooler to each baghouse controlling the piece of equipment.

II. Operational Restrictions

- 1. The permittee shall operate each baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress points from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from each stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions when not representative of normal operations. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emissions Limitations:
PE from both baghouse stacks combined shall not exceed 3.5 pounds per hour PM10 emissions shall not exceed 2.6 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emission unit and six months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

PE from both baghouse stacks combined shall not exceed 15.3 tons per year. PM10 emissions shall not exceed 11.4 tons per year.

Applicable Compliance Method:

To demonstrate compliance with the annual limitations, the permittee may multiply the hourly emission rates determined through the testing required above by the maximum annual hours of operation of 8,760. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual particulate and PM10 emission in tons.

1.c Emissions Limitation:

PE from each baghouse shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Compliance shall be determined through emissions testing required in Section V.1.a. of this permit.

1.d Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a), (B)(4)(b) and (B)(4)(c) of OAC rule 3745-17-03.

1.e Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as provided by rule.

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 2 granulation drum & process cooler, each vented to two separate baghouses	OAC rule 3745-31-05(D) (PTI-01-8436)	NH3 emissions shall not exceed 88.0 pounds per hour. See B.I.2.a below.

2. **Additional Terms and Conditions**

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
 NH3 emissions shall not exceed 88.0 pounds per hour.

Applicable Compliance Method:
 Emissions testing was conducted for this emissions unit in 1998. The emissions test showed compliance with the emission limitation for this emissions unit.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 3 Resin Reactor No. 1 (P037)

Activity Description: reactor vessel

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 3 resin reactor #1 vented to a wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the scrubber stack shall not exceed 0.15 pound per hour and 0.65 ton per year.
		Particulate emissions less than 10 microns (PM10) from the scrubber stack shall not exceed 0.15 pound per hour and 0.65 ton per year.
		Particulate emissions from the scrubber stack shall not exceed 0.01 grain/scf.
		PM10 emissions from the scrubber stack shall not exceed 0.01 grain/scf.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as exempted by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The wet scrubber controlling this emissions unit is shared by emissions units P037, P038, P047, and P048. Therefore, for the purposes of emission testing, the emissions from the scrubber stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all four emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.b** The permittee shall vent all the particulate emissions to the wet scrubber whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the wet scrubber whenever this emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate when the emissions unit is in operation. The monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information:

- a. the scrubber water flow rate, in gallons per minute, on a per shift basis; and
 - b. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. In accordance with paragraph A.1.c.ii. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify all deviations of the water flow rate specified in Section A.II.2. above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
Particulate emissions from the scrubber stack shall not exceed 0.15 pound per hour. PM10 emissions from the scrubber stack shall not exceed 0.15 pound per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

- 1.b Emission Limitations:
Particulate emissions from the scrubber stack shall not exceed 0.65 ton per year. PM10 emissions from the scrubber stack shall not exceed 0.65 ton per year.

Applicable Compliance Method:

To determine compliance with the annual particulate and PM10 emission limitations, the hourly emission rates determined during the May 19 and 20, 1999 stack tests shall be multiplied by the actual annual hours of operation recorded in Section A.III.3 and divided by 2,000 pounds per ton.

- 1.c Emission Limitations:
Particulate emissions from the scrubber stack shall not exceed 0.01 grain/scf. PM10 emissions from the scrubber stack shall not exceed 0.01 grain/scf.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 3 resin reactor #1 with wet scrubber	OAC rule 3745-31-05(D) (PTI 01-7992)	NH3 emissions shall not exceed 41.5 pounds per hour. See B.I.2.a below.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:
 NH3 emissions shall not exceed 41.5 pounds per hour.

Applicable Compliance Method:
 Emissions testing was conducted for this emissions unit on May 19 and 20, 1999. The emissions test showed compliance with the emission limitation for this emissions unit.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 3 Resin Reactor No. 2 (P038)

Activity Description: reactor vessel

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 3 resin reactor #2 vented to a wet scrubber	OAC rule 3745-31-05(A)(3) (PT-01-07992)	Particulate emissions from the scrubber stack shall not exceed 0.15 pound per hour and 0.65 ton per year.
		Particulate emissions less than 10 microns (PM10) from the scrubber stack shall not exceed 0.15 pound per hour and 0.65 ton per year.
		Particulate emissions from the scrubber stack shall not exceed 0.01 grain/scf.
		PM10 emissions from the scrubber stack shall not exceed 0.01 grain/scf.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The wet scrubber controlling this emissions unit is shared by emissions units P037, P038, P047, and P048. Therefore, for the purposes of emission testing, the emissions from the scrubber stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all four emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.b** The permittee shall vent all the particulate emissions to the wet scrubber whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the wet scrubber whenever this emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information:

- a. the scrubber water flow rate, in gallons per minute, on per shift basis; and
 - b. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. In accordance with paragraph A.1.c.ii. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify all deviations of the water flow rate specified in Section A.II.2 above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the scrubber stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
Particulate emissions shall not exceed 0.15 pound per hour. PM10 emissions shall not exceed 0.15 pound per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

- 1.b Emission Limitations:
Particulate emissions from the scrubber stack shall not exceed 0.65 ton per year. PM10 emissions from the scrubber stack shall not exceed 0.65 ton per year.

Applicable Compliance Method:

To determine compliance with the annual particulate and PM10 emission limitations, the hourly emission limitations specified in Section A.V.1.a shall be multiplied by the actual annual hours of operation recorded in Section A.III.3 and divided by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emission Limitations:

Particulate emissions from the scrubber stack shall not exceed 0.01 grain/scf. PM10 emissions from the scrubber stack shall not exceed 0.01 grain/scf.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Emission testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with these emission limitations.

1.d Emission Limitation:

Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 3 resin reactor #2 vented to a wet scrubber	OAC rule 3745-31-05(D) (PTI 01-7992)	NH3 emissions shall not exceed 41.5 pounds per hour. See B.I.2.a below.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I of these terms and conditions shall be determined in accordance with the following method:

Emissions Limitation:
Emissions shall not exceed 41.5 pounds per hour.

Applicable Compliance Method:
Emissions testing was conducted for this emissions unit on May 19 and 20, 1999. The emissions test showed compliance with the emission limitation for this emissions unit.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 3 Granulation Drum and Process Cooler (P040)

Activity Description: granulation drum and process cooler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 3 granulation drum and process cooler, each vented to a separate baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	<p>Particulate emissions from both baghouse stacks combined shall not exceed 3.03 pounds per hour and 13.3 tons per year.</p> <p>Particulate emissions less than 10 microns (PM10) from both baghouse stacks combined shall not exceed 3.03 pounds per hour and 13.3 tons per year.</p> <p>Particulate emissions from each baghouse stack shall not exceed 0.005 grain/scf.</p> <p>PM10 emissions from each baghouse stack shall not exceed 0.005 grain/scf.</p> <p>NOx emissions from both baghouse stacks combined shall not exceed 0.09 pound per hour and 0.40 ton per year.</p> <p>CO emissions from both baghouse stacks combined shall not exceed 0.07 pound per hour and 0.31 ton per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p>
		See A.I.2.a below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	Visible particulate emissions from each baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.
	OAC rule 3745-21-08(B)	None, see Section A.I.2.f below.
	OAC rule 3745-23-06(B)	None, see Section A.I.2.g below.

2. Additional Terms and Conditions

- 2.a** There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** This emissions unit is vented to two baghouses. The granulation drum vents to one baghouse and the process cooler shares the other baghouse with the System 3 product handling operation (P041) and the System 3 blending operation (P042). Therefore, for the purposes of emission testing, the emissions from the baghouse stacks of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all three emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.e** The permittee shall vent the particulate emissions to each baghouse whenever this emissions unit is in operation.
- 2.f** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-7992.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2. Additional Terms and Conditions (continued)

- 2.g** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-7992.

II. Operational Restrictions

1. The permittee shall operate each baghouse whenever this emissions unit is in operation.
2. The permittee shall burn only natural gas or LPG in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouses serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the visible emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

III. Monitoring and/or Record Keeping Requirements (continued)

3. For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The permittee shall maintain annual records of the total operating hours for this emissions unit.
5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from either baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall notify the Ohio EPA, Central District Office in writing of any record showing that a fuel other than natural gas or LPG was burned in this emissions unit. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from both baghouse stacks combined shall not exceed 3.03 pounds per hour. PM10 emissions from both baghouse stacks combined shall not exceed 3.03 pounds per hour.

Applicable Compliance Methods:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations at the non-stack egress points housing this emissions unit shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 and Method 201 or 201A test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from both baghouses combined shall not exceed 13.3 tons per year. PM10 emissions from both baghouses combined shall not exceed 13.3 tons per year.

Applicable Compliance Method:

To demonstrate compliance with the annual particulate and PM10 emission limitations, the hourly emission rates established in the May 19 and 20, 1999 stack tests shall be multiplied by the actual annual hours of operation recorded in Section A.III.4. and divided by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emissions Limitations:

Particulate emissions from each baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from each baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Emission testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

Future compliance shall be determined through testing required in Section A.V.1.a of this permit.

1.d Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a), (B)(4)(b) and (B)(4)(c) of OAC rule 3745-17-03.

1.e Emissions Limitation:

Visible particulate emissions from each baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.f Emission Limitations:

NOx emissions from both baghouse stacks combined shall not exceed 0.09 pound per hour and 0.40 ton per year.

Applicable Compliance Method:

Compliance with the hourly NOx emission limitation may be demonstrated by multiplying an emission factor of 100 pounds NOx per million cubic feet (AP-42, Table 1.4-1,7/98) by the maximum natural gas consumption of the emissions unit of 850 cubic feet per hour. The annual emission limitation was established by multiplying the hourly emission rate by the maximum annual hours of operation (8,760) and dividing by 2,000 pounds per ton. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

1.g Emission Limitations:

Carbon monoxide emissions from both baghouse stacks combined shall not exceed 0.07 pound per hour and 0.31 ton per year.

Applicable Compliance Method:

Compliance with the hourly CO emission limitation may be demonstrated by multiplying the emission factor 84 pounds CO per million cubic feet (AP-42, Table 1.4-1,7/98) by the maximum natural gas consumption of the emissions unit of 850 cubic feet per hour. The annual emission rate was established by multiplying the maximum annual hours of operation (8,760) and dividing by 2,000 pounds per ton. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 3 granulation drum and process cooler with two baghouses	OAC rule 3745-31-05(D) (PTI 01-7992)	NH3 emissions from both baghouse stacks combined shall not exceed 20.0 pounds per hour. See B.I.2.a below.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:

NH3 emissions from both baghouse stacks combined shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Emission testing was conducted for this emissions unit in 1999. The emissions test showed compliance with the emission limitation for this emissions unit.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 3 Product Handling (P041)
Activity Description: screens, mills, conveyors and elevators

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 3 screens, mills, conveyors and elevators, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the baghouse stack shall not exceed 0.51 pound per hour and 2.2 tons per year.
		Particulate emissions less than 10 microns (PM10) from the baghouse stack shall not exceed 0.51 pound per hour and 2.2 tons per year.
		Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a** There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** The baghouse controlling this emissions unit is shared by the System 3 process cooler (P040) and System 3 blending operation (P042). Therefore, for the purposes of emission testing, the emissions from the baghouse stacks of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all three emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.e** The permittee shall vent the particulate emissions from the screens, mills, conveyors and elevators to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.51 pound per hour. PM10 emissions shall not exceed 0.51 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations the non-stack egress points from the building housing this emissions unit shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Emission testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 2.2 tons per year. PM10 emissions from the baghouse stack shall not exceed 2.2 tons per year.

Applicable Compliance Method:

To demonstrate compliance with the annual particulate and PM10 emission limitations, the hourly emission rates established by the May 19 and 20, 1999 stack tests shall be multiplied by the actual annual hours of operation recorded in Section A.III.3. and divided by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emissions Limitation:

Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf. PM 10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Emission testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

Future compliance shall be determined through testing required in Section A.V.1.a of this permit.

1.d Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.e Emissions Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 3 Product Blending (P042)

Activity Description: Blending equipment

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 3 blending vessel vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	<p>Particulate emissions from the baghouse stack shall not exceed 0.22 pound per hour and 0.95 ton per year.</p> <p>Organic compound emissions shall not exceed 1.5 pounds per hour and 6.6 tons per year.</p> <p>Particulate emissions less than 10 microns (PM10) from the baghouse stack shall not exceed 0.22 pound per hour and 0.95 ton per year.</p> <p>Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf.</p> <p>PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.</p> <p>See A.I.2.a below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p> <p>Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.</p>
	OAC rule 3745-17-07(A)	

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a** There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** The baghouse controlling this emissions unit is shared by the System 3 process cooler (P040) and System 3 product handling operation (P041). Therefore, for the purposes of emission testing, the emissions from the baghouse stacks of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all three emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.e** The permittee shall vent the particulate emissions to the baghouse whenever this emissions unit is in operation.

II. Operational Restrictions

- 1.** The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from either baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
Particulate emissions from the baghouse stack shall not exceed 0.22 pound per hour. PM10 emissions from the baghouse stack shall not exceed 0.22 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations the non-stack egress points from the building housing this emissions unit shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Emission testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with these emission limitations.

- 1.b Emission Limitations:
Particulate emissions from the baghouse stack shall not exceed 0.95 ton per year. PM10 emissions from the baghouse stack shall not exceed 0.95 ton per year.

Applicable Compliance Method:

Compliance with the annual particulate and PM10 emission limitations shall be demonstrated by multiplying the hourly emission rates established by the May 19 and 20, 1995 stack tests or by the most recent emission test that demonstrated the emissions unit was in compliance, by the actual hours of operation recorded in Section A.III.3., and dividing by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Emission testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

Future compliance shall be determined through testing required in Section A.V.1.a of this permit.

1.d Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a), (B)(4)(b) and (B)(4)(c) of OAC rule 3745-17-03.

1.e Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.f Emission Limitation:

Organic compound emissions shall not exceed 1.5 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. Emission testing shall be conducted during years 1, 3, and 5 of the term of this permit. (P042 and P052 are identical emissions units and the annual testing requirement has been alternated between these two emissions units during the term of this permit. Annual testing is being required because the permittee has not provided a compliance monitoring or record keeping approach to ensure ongoing compliance with this emission limitation.)
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 18, 25, and/or 25A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

1.g Emission Limitation:

Organic Compound emissions shall not exceed 6.6 tons per year.

Applicable Compliance Method:

Compliance with the annual limitation shall be demonstrated by multiplying the results of the hourly OC emission testing above by the annual hours of operation recorded in Section A.III.3.

Facility Name: **The Scotts Company, Marysville Chem Plant**
Facility ID: **01-80-01-0008**
Emissions Unit: **System 3 Product Blending (P042)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 1,2 and 3 Packaging (P043)
Activity Description: System 1,2 and 3 Packaging with Fabric Filter

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
bulk loading, filling, and packaging for Systems 1, 2, and 3 vented to two baghouses and one cartridge filter	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the baghouse and cartridge filter stacks combined shall not exceed 1.54 pounds per hour and 6.8 tons per year.
		Particulate emissions less than 10 microns (PM10) from the baghouse and cartridge filter stacks combined shall not exceed 1.14 pounds per hour and 5.0 tons per year.
		Particulate emissions from each baghouse or cartridge filter stack shall not exceed 0.005 grain/scf.
		PM10 emissions from each baghouse or cartridge filter stack shall not exceed 0.005 grain/scf.
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
		Visible particulate emissions from each baghouse and cartridge filter stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d The permittee shall vent the particulate emissions from all bulk loading, filling, and packaging operations to each baghouse or cartridge filter controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate each baghouse whenever the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each baghouse and cartridge filter stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any baghouse or cartridge filter stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse and cartridge filter stacks combined shall not exceed 1.54 pounds per hour. Particulate emissions less than 10 microns (PM10) from the baghouse and cartridge filter stacks combined shall not exceed 1.14 pounds per hour. Particulate emissions from each baghouse or cartridge filter stack shall not exceed 0.005 grain/scf. PM 10 emissions from each baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations the non-stack egress points from the building housing this emissions unit shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from the baghouse stacks combined shall not exceed 6.8 tons per year. Particulate emissions less than 10 microns (PM10) from the baghouse and cartridge filter stacks combined shall not exceed 5.0 tons per year.

Applicable Compliance Method:

To demonstrate compliance with the annual particulate and PM10 emission limitations, the hourly emission rates established by the initial stack tests required by PTI 01-7992 shall be multiplied by the actual annual hours of operation recorded in Section A.III.3. and divided by 2,000 pounds per ton.

1.c Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

V. Testing Requirements (continued)

1.d Emissions Limitation:

Visible particulate emissions from each baghouse and cartridge filter stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 4- Monamonimum phosphate, potash & verm. system (P044)

Activity Description: System 4 raw material handling for mon-a-mon, vermiculite and potash.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 monammonium and potash material handling and unloading with conveyors and elevators, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the baghouse stack and fugitives combined shall not exceed 1.4 pound per hour and 6.1 tons per year.
		Particulate emissions less than 10 microns (PM10) from the baghouse stack and fugitives combined shall not exceed 1.1 pound per hour and 4.6 tons per year.
		Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		Fugitive visible particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
		Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c** The baghouse controlling this emissions unit is shared by emissions units P045, P046, P049, P051, and P052. Therefore, for the purposes of emission testing, the emissions from the baghouse stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all five emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.d** The permittee shall vent the particulate emissions from the material handling and unloading conveyors and elevators to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

- 2. The permittee shall maintain annual records of the total operating hours for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- f. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- g. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from either baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emissions Limitations:

Particulate emissions from the baghouse stack and fugitives combined shall not exceed 1.4 pounds per hour. Particulate emissions less than 10 microns (PM10) shall not exceed 1.1 pounds per hour.

Applicable Compliance Method:

Fugitive emissions estimates for this operation were based upon an overall 94% capture efficiency and an uncontrolled PM/PM10 emissions factor of 0.2 lb per ton (based on the Ohio EPA RACM document, Figure 2.12.-3) of material handled. The following equation may be used to determine fugitive emissions during testing:

$$(0.06) \times (0.2 \text{ lb particulate/PM10 per ton}) \times (\text{production rate during test, in tons})$$

Alternate emission factors may be used with prior approval from the Ohio EPA.

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The hourly emission rates established during the emission testing shall be added to the estimated fugitive PM and PM10 emissions to determine compliance with the hourly particulate and PM10 emission limitations.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

V. Testing Requirements (continued)

1.b Emission Limitations:

Particulate emissions from the baghouse stack and fugitives shall not exceed 6.1 tons per year. Particulate emissions less than 10 microns (PM10) shall not exceed 4.6 tons per year.

Applicable Compliance Method:

To determine compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the actual annual hours of operation recorded in Section A.III.2. and divide by 2,000 pounds per ton.

1.c Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Compliance shall be determined through the emissions testing required in Section A.V.1.a. of this permit.

1.d Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.e Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 4-Raw Material Handling Handling System (P045)

Activity Description: System 4 Material handling/unloading for urea, monammonium phosphate, KCl, limestone and chloride

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 monammonium, urea, limestone, and potassium chloride material handling with conveyors and elevator, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the baghouse stack and fugitives combined shall not exceed 1.0 pound per hour and 4.4 tons per year.
		Particulate emissions less than 10 microns (PM10) from the baghouse stack and fugitives combined shall not exceed 0.9 pound per hour and 3.9 tons per year.
		Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		Fugitive visible particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
		Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c** The baghouse controlling this emissions unit is shared by emissions units P044, P046, P049, P051, P052. Therefore, for the purposes of emission testing, the emissions from the baghouse stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all five emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.d** The permittee shall vent the particulate emissions from the material handling conveyors and elevator to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

- 2. The permittee shall maintain annual records of the total operating hours for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- f. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- g. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack and fugitives combined shall not exceed 1.0 pound per hour. PM10 from the baghouse stack and fugitives combined shall not exceed 0.9 pound per hour.

Applicable Compliance Method:

Fugitive emissions estimates for this operation are based upon an overall 94% capture efficiency and an uncontrolled particulate/PM10 emissions factor of 0.2 lb per ton (RACM for Fertilizer Mixing/Blending Plants, Table 2.12-1, 1983) of material handled. The following equation may be used to determine fugitive emissions during testing:

$$(0.06) \times (0.2 \text{ lb particulate/PM10 per ton}) \times (\text{production rate during test, in tons})$$

Alternate emission factors may be used with prior approval from the Ohio EPA.

To determine compliance with the hourly particulate and PM10 limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit and within 6 months prior to expiration of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from the baghouse stack and fugitives combined shall not exceed 4.4 tons per year. PM10 from the baghouse stack and fugitives combined shall not exceed 3.9 tons per year.

Applicable Compliance Method:

To determine compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the actual annual hours of operation recorded in Section A.III.2. and divide by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

Particulate emissions from each baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from each baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Compliance shall be determined through the emissions testing required in Section A.V.1.a. of this permit.

1.d Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.e Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 4- Urea Handling/Unloading (P046)

Activity Description: System 4 urea unloading/handling system

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 urea handling and unloading with conveyors and pneumatic equipment, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the baghouse stack and fugitives combined shall not exceed 0.25 pound per hour and 1.1 tons per year.
		Particulate emissions less than 10 microns (PM10) from the baghouse stack and fugitives combined shall not exceed 0.19 pound per hour and 0.8 ton per year.
		Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		Fugitive visible particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
		Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The baghouse controlling this emissions unit is shared by emissions units P044, P045, P049, P051, and P052. Therefore, for the purposes of emission testing, the emissions from the baghouse stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all five emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.d The permittee shall vent the particulate emissions from the urea handling and unloading conveyors and pneumatic equipment to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- f. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- g. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack and fugitives combined shall not exceed 0.25 pound per hour. PM10 from the baghouse stack and fugitives combined shall not exceed 0.19 pound per hour.

Applicable Compliance Method:

Fugitive emissions estimates for this operation shall be based upon an overall 94% capture efficiency and an uncontrolled emission factor of 0.02 lb particulate per ton of material handled (based on FIRE v6.01/SCC 301040007). The following equation may be used to determine fugitive emissions during testing:

$$(0.06) \times (0.2 \text{ lb particulate/PM10 per ton}) \times (\text{production rate during test, in tons})$$

Alternate emission factors may be used with prior approval from the Ohio EPA.

To determine compliance with the hourly particulate and PM10 limitations from the stack, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The hourly emission rates established during the emission testing shall be added to the estimated fugitive PM and PM10 emissions to determine compliance with the hourly PM and PM10 emission limitations.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA Central District Office.

V. Testing Requirements (continued)

1.b Emission Limitations:

Particulate emissions from the baghouse stack and fugitives combined shall not exceed 1.1 tons per year. PM10 from the baghouse stack and fugitives combined shall not exceed 0.8 ton per year.

Applicable Compliance Method:

To demonstrate compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the actual annual hours of operation recorded in Section A.III.3. and divide by 2,000 pounds per ton.

1.c Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Compliance shall be determined through the emission testing required in Section A.V.1.a of this permit.

1.d Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.e Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System #4, Resin Reactor #1 (P047)

Activity Description: Resin reactor vessel

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 resin reactor #1 vented to a wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the scrubber stack shall not exceed 0.22 pound per hour and 0.96 ton per year.
		Particulate emissions less than 10 microns (PM10) from the scrubber stack shall not exceed 0.22 pound per hour and 0.96 ton per year.
		Particulate emissions from the scrubber stack shall not exceed 0.01 grain/scf.
		PM10 emissions from the scrubber stack shall not exceed 0.01 grain/scf.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-11(B)	Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The wet scrubber controlling this emissions unit is shared by emissions units P037, P038, and P048. Therefore, for the purposes of emission testing, the emissions from the scrubber stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all four emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.b** The permittee shall vent all the particulate emissions to the wet scrubber whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the wet scrubber whenever this emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while the emissions units are in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information:

- a. the scrubber water flow rate, in gallons per minute, on per shift basis; and
 - b. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. In accordance with paragraph A.1.c.ii. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify all deviations of the water flow rate specified in Section A.II.2 above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:

Particulate emissions from the scrubber stack shall not exceed 0.22 pound per hour. PM10 emissions from the scrubber stack shall not exceed 0.22 pound per hour.

Applicable Compliance Method:
To determine compliance with the particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

 - i. The emission testing shall be conducted within 180 days of the startup of the emissions unit and within 6 months prior to permit expiration.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
 - v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from the scrubber stack shall not exceed 0.96 ton per year. PM10 emissions from the scrubber stack shall not exceed 0.96 ton per year.

Applicable Compliance Method:

To determine compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the actual annual hours of operation recorded in Section A.III.3 and divide by 2,000 pounds per ton.

1.c Emission Limitation:

Particulate emissions from the scrubber stack shall not exceed 0.01 grain/scf. PM10 emissions from the scrubber stack shall not exceed 0.01 grain/scf.

Applicable Compliance Method:

Compliance shall be determined through the emission testing required in Section A.V.1.a of this permit.

1.d Emissions Limitation:

Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 resin reactor #1 with wet scrubber	OAC rule 3745-31-05(D) (PTI 01-7992)	NH3 emissions from the scrubber stack shall not exceed 42.5 pounds per hour. See B.I.2.a below.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:

NH₃ emissions from the scrubber stack shall not exceed 42.5 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly NH₃ emissions limit limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 4-Resin Reactor #2 (P048)

Activity Description: Resin reactor vessel

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 resin reactor #2 vented to a wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the scrubber stack shall not exceed 0.22 pound per hour and 0.96 ton per year.
		Particulate emissions less than 10 microns (PM10) from the scrubber stack shall not exceed 0.22 pound per hour and 0.96 ton per year.
		Particulate emissions from the scrubber stack shall not exceed 0.01 grain/scf.
		PM10 emissions from the scrubber stack shall not exceed 0.01 grain/scf.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-11(B)	Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The wet scrubber controlling this emissions unit is shared by emissions units P037, P038, and P047. Therefore, for the purposes of emission testing, the emissions from the scrubber stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all four emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.b** The permittee shall vent all the particulate emissions to the wet scrubber whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the wet scrubber whenever this emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while the emissions units are in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information:

- a. the scrubber water flow rate, in gallons per minute, on per shift basis; and
 - b. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit on daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the wet scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. In accordance with paragraph A.1.c.ii. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify all deviations of the water flow rate specified in Section A.II.2. above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
Particulate emissions shall not exceed 0.22 pound per hour. PM10 emissions shall not exceed 0.22 pound per hour. Particulate emissions from the scrubber stack shall not exceed 0.01 grain/scf. PM10 emissions from the scrubber stack shall not exceed 0.01 grain/scf.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from the scrubber stack shall not exceed 0.96 ton per year. PM10 emissions from the scrubber stack shall not exceed 0.96 tons per year.

Applicable Compliance Method:

To determine compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the actual annual hours of operation recorded in Section A.III.3. and divide by 2,000 pounds per ton.

1.c Emission Limitation:

Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 resin reactor #2 with wet scrubber	OAC rule 3745-31-05(D) (PTI 01-7992)	NH3 emissions from the scrubber stack shall not exceed 42.5 pounds per hour. See B.I.2.a below.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with the following method:

Emissions Limitation:

NH₃ emissions from the scrubber stack shall not exceed 42.5 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly NH₃ emissions limit limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA Central District Office.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 4- Granulator and process cooler (P049)

Activity Description: granulation drum and process cooler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 granulation drum and process cooler, each vented to a separate baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	<p>Particulate emissions from both baghouse stacks combined shall not exceed 3.03 pounds per hour and 13.3 tons per year.</p> <p>Particulate emissions less than 10 microns (PM10) from both baghouse stacks combined shall not exceed 3.03 pounds per hour and 13.3 tons per year.</p> <p>Particulate emissions from each baghouse stack shall not exceed 0.005 grain/scf.</p> <p>PM10 emissions from each baghouse stack shall not exceed 0.005 grain/scf.</p> <p>See A.I.2.a below.</p> <p>NOx emissions from both baghouse stacks combined shall not exceed 0.09 pound per hour and 0.40 ton per year.</p> <p>CO emissions from both baghouse stacks combined shall not exceed 0.07 pound per hour and 0.31 ton per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	Visible particulate emissions from each baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.
	OAC rule 3745-21-08(B)	None, see Section A.I.2.f below.
	OAC rule 3745-23-06(B)	None, see Section A.I.2.g below.

2. Additional Terms and Conditions

- 2.a** There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** This emissions unit is vented to two baghouses. The granulation drum vents to one baghouse and the process cooler shares the other baghouse with emissions units P044, P045, P046, P051, and P052. Therefore, for the purposes of emission testing, the emissions from the baghouse stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all five emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.
- 2.e** The permittee shall vent the particulate emissions from the granulation drum and process cooler to the baghouse controlling each piece of equipment.
- 2.f** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-7992.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2. Additional Terms and Conditions (continued)

- 2.g** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-7992.

II. Operational Restrictions

1. The permittee shall operate each baghouse whenever this emissions unit is in operation.
2. The permittee shall burn only natural gas or LPG in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the visible emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

III. Monitoring and/or Record Keeping Requirements (continued)

3. For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The permittee shall maintain annual records of the total operating hours for this emissions unit.
5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from each baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall notify the Ohio EPA, Central District Office in writing of any record showing that a fuel other than natural gas or LPG was burned in this emissions unit. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from both baghouse stacks combined shall not exceed 3.03 pounds per hour. PM10 emissions from both baghouse stacks combined shall not exceed 3.03 pounds per hour. Particulate emissions from each baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from each baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

To determine compliance with the particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations at any non-stack egress points from the building housing this emissions units shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 and Method 201 or 201A test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from both baghouse stacks combined shall not exceed 13.3 tons per year. PM10 emissions from both baghouse stacks combined shall not exceed 13.3 tons per year.

Applicable Compliance Method:

To determine compliance with the annual limitations, the permittee may multiply the hourly emission rates determined through the testing required above by the actual annual hours of operation recorded in Section A.III.4. and divide by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a), (B)(4)(b) and (B)(4)(c) of OAC rule 3745-17-03.

1.d Emissions Limitation:

Visible particulate emissions from each baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.e Emission Limitations:

NOx emissions from both baghouses combined shall not exceed 0.09 pound per hour and 0.40 ton per year.

Applicable Compliance Method:

Compliance with the hourly NOx emission limitation may be determined by multiplying an emission factor of 100 pounds NOx per million cubic feet (from table 1.4-1(7/98) of AP-42, 5th edition) by the maximum natural gas consumption of the emissions unit of 850 cubic feet per hour. The annual emission limitation was established by multiplying the hourly emission rate by the maximum annual hours of operation (8,760) and dividing by 2,000 pounds per ton. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

1.f Emission Limitations:

CO emissions from both baghouse stacks combined shall not exceed 0.07 pound per hour and 0.31 ton per year.

Applicable Compliance Method:

Compliance with the hourly CO emission limitation may be determined by multiplying an emission factor 84 pounds CO per million cubic feet (from table 1.4-1(7/98) of AP-42, 5th edition) by the maximum natural gas consumption of the emissions unit of 850 cubic feet per hour. The annual emission rate was established by multiplying the maximum annual hours of operation (8,760) and dividing by 2,000 pounds per ton. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

Facility Name: **The Scotts Company, Marysville Chem Plant**
Facility ID: **01-80-01-0008**
Emissions Unit: **System 4- Granulator and process cooler (P049)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 granulation drum and process cooler each vented to a separate baghouse	OAC 3475-31-05(D) (PTI 01-7992)	NH3 emissions from both baghouse stacks combined shall not exceed 20.0 lbs per hour. See B.I.2.a below.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:

NH₃ emissions from both baghouse stacks combined shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly NH₃ emissions limit limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 4- Packaging Operations (P050)

Activity Description: packaging operations

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 packaging operations with elevators, conveyors and feed bins, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the baghouse stack shall not exceed 0.51 pound per hour and 2.25 tons per year.
		Particulate emissions less than 10 microns (PM10) from the baghouse stack shall not exceed 0.38 pound per hour and 1.67 tons per year.
		Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-11(B)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a** There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** The permittee shall vent the particulate emissions from the elevators, conveyors and feed bins to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point of the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.51 pound per hour. PM10 emissions from the baghouse stack shall not exceed 0.38 pound per hour. Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations at any non- stack egress points from the building housing this emissions unit shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 2.25 tons per year. PM10 emissions from the baghouse stack shall not exceed 1.67 tons per year.

Applicable Compliance Method:

To determine compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the actual annual hours of operation recorded in Section A.III.3 and divide by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a), (B)(4)(b) and (B)(4)(c) of OAC rule 3745-17-03.

1.d Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 4- Product Handling (P051)

Activity Description: mills, elevators, screens, conveyors

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 milling, screening, elevators and conveyors, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	Particulate emissions from the baghouse stack shall not exceed 0.51 pound per hour and 2.2 tons per year.
		Particulate emissions less than 10 microns (PM10) from the baghouse stack shall not exceed 0.51 pound per hour and 2.2 tons per year.
		Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.
		See A.I.2.a below.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A). Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a** There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** The baghouse controlling this emissions unit is shared by emissions units P044, P045, P046, P049, and P052. Therefore, for the purposes of emission testing, the emissions from the baghouse stack of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all five emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.e** The permittee shall vent the particulate emissions from the mills, screens, elevators and conveyors to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.51 pound per hour. PM10 emissions from the baghouse stack shall not exceed 0.51 pound per hour. Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations at any non-stack egress points from the building housing this emissions unit shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 2.2 tons per year. PM10 emissions from the baghouse stack shall not exceed 2.2 tons per year.

Applicable Compliance Method:

To demonstrate compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the actual annual hours of operation recorded in Section A.III.3 and divide by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a), (B)(4)(b) and (B)(4)(c) of OAC rule 3745-17-03.

1.d Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following test requirements are as stringent or more stringent than the testing requirements contained in Permit to Install #01-7992, issued on December 27, 2001: Paragraph A.V.1.a. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 4-Blending (P052)

Activity Description: Blending vessel

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 4 blending vessel vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-7992)	<p>Particulate emissions from the baghouse stack shall not exceed 0.22 pound per hour and 0.95 ton per year.</p> <p>Organic compound emissions shall not exceed 1.5 pounds per hour and 6.6 tons per year.</p> <p>Particulate emissions less than 10 microns (PM10) from the baghouse stack shall not exceed 0.22 pound per hour and 0.95 ton per year.</p> <p>Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf.</p> <p>PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.</p> <p>See A.I.2.a below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p> <p>Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.</p>
	OAC rule 3745-17-07(A)	

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a** There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** The baghouse controlling this emissions unit is shared by the System 3 process cooler (P040) and System 3 product handling operation (P041). Therefore, for the purposes of emission testing, the emissions from the baghouse stacks of this emissions unit shall not exceed the sum of the emission limitations for the emissions units that are in operation during the emission testing.

Unless the emission tests are conducted with all three emissions units in operation, the number of emissions units in operation during any emissions tests shall be representative of the number of emissions units typically in operation.

- 2.e** The permittee shall vent the particulate emissions to the baghouse whenever this emissions unit is in operation.

II. Operational Restrictions

- 1.** The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

Notwithstanding the frequency of reporting requirements specified in Section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

- d. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

3. The permittee shall maintain annual records of the total operating hours for this emissions unit.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-7992, issued on December 27, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from either baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
Particulate emissions from the baghouse stack shall not exceed 0.22 pound per hour. PM10 emissions from the baghouse stack shall not exceed 0.22 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations the non-stack egress points from the building housing this emissions unit shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. Three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Emission testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with these emission limitations.

- 1.b Emission Limitations:
Particulate emissions from the baghouse stack shall not exceed 0.95 ton per year. PM10 emissions from the baghouse stack shall not exceed 0.95 ton per year.

Applicable Compliance Method:

Compliance with the annual particulate and PM10 emission limitations shall be demonstrated by multiplying the hourly emission rates established by the May 19 and 20, 1995 stack tests or by the most recent emission test that demonstrated the emissions unit was in compliance, by the actual hours of operation recorded in Section A.III.3., and dividing by 2,000 pounds per ton.

V. Testing Requirements (continued)

1.c Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Emission testing was conducted for this emissions unit on May 19 and 20, 1999 and demonstrated compliance with this emission limitation.

Future compliance shall be determined through testing required in Section A.V.1.a of this permit.

1.d Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a), (B)(4)(b) and (B)(4)(c) of OAC rule 3745-17-03.

1.e Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.f Emission Limitation:

Organic compound emissions shall not exceed 1.5 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. Emission testing shall be conducted during years 2 and 4 of the term of this permit. (P042 and P052 are identical emissions units and the annual testing requirement has been alternated between these two emissions units during the term of this permit. Annual testing is being required because the permittee has not provided a compliance monitoring or record keeping approach to ensure ongoing compliance with this emission limitation.)
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 18, 25, and/or 25A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

1.g Emission Limitation:

Organic Compound emissions shall not exceed 6.6 tons per year.

Applicable Compliance Method:

Compliance with the annual limitation shall be demonstrated by multiplying the results of the hourly OC emission testing above by the annual hours of operation recorded in Section A.III.3.

Facility Name: **The Scotts Company, Marysville Chem Plant**
Facility ID: **01-80-01-0008**
Emissions Unit: **System 4-Blending (P052)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BB Pest Blender (P067)
Activity Description: Bulk Blend Pesticide Blending Vessel w/fabric filter and carbon

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
bulk blend blending vessel vented to a baghouse and carbon adsorber	OAC rule 3745-31-05(A)(3) (PTI 01-8386)	Organic compound (OC) emissions from the carbon adsorber stack shall not exceed 1.3 pounds per hour and 6.0 tons per year. See A.III.2 below. Particulate emissions from the carbon adsorber stack shall not exceed 0.1 pound per hour and 0.6 ton per year.
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the carbon adsorber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** OC emissions shall not exceed 30.2 tons per rolling, 12-month period from emissions units P067, P068, and P020 combined.
- 2.b** The permittee shall vent all the OC emissions to the carbon adsorber whenever the emissions unit is in operation.
- 2.c** The permittee shall vent all the particulate emissions to the baghouse whenever this emissions unit is in operation.

II. Operational Restrictions

- The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (i.e., 1.04 pounds/hour or 55 ppm).

II. Operational Restrictions (continued)

2. The permittee shall operate the carbon adsorber and baghouse whenever the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total production rate of P067, in tons;
 - b. the total OC emissions for emissions unit P067 using the following equation:
(OC emission rate established by the testing required in Section A.V.1.a, in pounds OC per ton of production) x (the production rate of P067 required by A.III.1.a above); and
 - c. the rolling, 12-month summation of OC emissions for emissions units P067, P068, and P020 combined, in tons, calculated by summing the total OC emissions for each emissions unit recorded in A.III.1.b above.
2. The permittee shall properly operate and maintain equipment to monitor the outlet gases from the carbon adsorber when the emissions unit is in operation. The equipment shall meet the specifications and performance criteria of Section 6.0 of Method 21 (40 CFR Part 60, Appendix A) to be considered a compliant monitoring device. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month bifenthrin is being blended, the permittee shall collect and record the following information on a twice per month basis:

 - a. the OC concentration of the outlet gas from the carbon adsorber, in ppm (the permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device measures several different concentrations);
 - b. the production rate of the emissions unit at the time the OC concentration is recorded, in tons per hour, for the purpose of ensuring that the OC concentration is recorded at or near normal operating conditions; and
 - c. if the maximum concentration exceeded 55 ppm, a record indicating the date and time the activated carbon was replaced.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping and requirements contained in Permit to Install #01-08386, issued on October 23, 2001: Paragraphs A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation for emissions units P067, P068, and P020 combined. These reports shall be submitted on the dates specified in paragraph A.1.c.ii. of the General Terms and Conditions.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all days in which the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm. The reports shall also include each day the activated carbon was replaced. These reports shall be submitted on the dates specified in paragraph A.1.c.ii. of the General Terms and Conditions.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
OC emissions from the carbon adsorber stack shall not exceed 1.3 pounds per hour.
Particulate emissions from the carbon adsorber stack shall not exceed 0.1 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the startup of this emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1-4 and 25A for OC and Methods 1-5 for particulate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

- 1.b** Emission Limitations:
OC emissions from the carbon adsorber stack shall not exceed 6.0 tons per year.
Particulate emissions from the carbon adsorber stack shall not exceed 0.6 ton per year.

Applicable Compliance Method:

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations are maintained (the annual limitations were calculated by multiplying the hourly limitations by 8760, and then dividing by 2000).

- 1.c** Emission Limitation:
OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067, P068, and P020 combined.

Applicable Compliance Method:

Compliance shall be demonstrated through the records required pursuant to Section A.III.1 of this permit.

- 1.d** Emission Limitation:
Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BB Drum Handling (P068)

Activity Description: Bulk Blend Drum Handling, Storage and transfer operations with vented hood and carbon adsorber

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
bulk blending drum handling, storage and transfer operations captured by a hood and vented to a carbon adsorber	OAC rule 3745-31-05(A)(3) (PTI 01-8386)	Organic compound (OC) emissions from the carbon adsorber stack shall not exceed 1.3 pounds per hour and 6.0 tons per year.
		See A.III.2 below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a OC emissions shall not exceed 30.2 tons per rolling, 12-month period from emissions units P067, P068, and P020 combined.
- 2.b The permittee shall vent all the OC emissions from the drum handling, storage, and transfer operations to the carbon adsorber at all times the emissions unit is in operation.

II. Operational Restrictions

1. The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (i.e., 1.04 pounds/hour or 55 ppm).
2. The permittee shall operate the carbon adsorber whenever the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total production rate of P068, in tons;
 - b. the total OC emissions for emissions unit P068 using the following equation:
(OC emission rate established by the testing required in Section A.V.1.a, in pounds OC per ton of production) x
(the production rate of P068 required by A.III.1.b above); and
 - c. the rolling, 12-month summation of OC emissions for emissions units P067, P068, and P020 combined, in tons, calculated by summing the total OC emissions for each emissions unit recorded in Section A.III.1.b.
2. The permittee shall properly operate and maintain equipment to monitor the outlet gases from the carbon adsorber when the emissions unit is in operation. The equipment shall meet the specifications and performance criteria of Section 6.0 of Method 21 (40 CFR Part 60, Appendix A) to be considered a compliant monitoring device. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month bifenthrin is being blended, the permittee shall collect and record the following information on a twice per month basis:

- a. the OC concentration of the outlet gas from the carbon adsorber, in ppm (the permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device measures several different concentrations);
 - b. the production rate of the emissions unit at the time the OC concentration is recorded, in tons per hour, for the purpose of ensuring that the OC concentration is recorded at or near normal operating conditions; and
 - c. if the maximum concentration exceeded 55 ppm, a record indicating the date and time the activated carbon was replaced.
3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #01-08386, issued on October 23, 2001: Paragraphs A.III.1. and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation for emissions units P067, P068, and P020 combined. These reports shall be submitted on the dates specified in paragraph A.1.c.ii. of the General Terms and Conditions.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all days in that the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm. The reports shall also include each day the activated carbon was replaced. These reports shall be submitted on the dates specified in paragraph A.1.c.ii. of the General Terms and Conditions.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

OC emissions from the carbon adsorber stack shall not exceed 1.3 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly OC limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the startup of this emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-4 and 25A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

OC emissions from the scrubber stack shall not exceed 6.0 tons per year.

Applicable Compliance Method:

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.c Emission Limitation:

OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067, P068, and P020 combined.

Applicable Compliance Method:

Compliance shall be demonstrated through the records required pursuant to Section A.III.1. of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: SYS 2 Raw Material & Product Handling (P071)

Activity Description: System 2 Raw Materials and Product Handling, Milling, screening, with baghouse

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 2 raw material and product handling including conveyors, mills, and screens, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-08436)	<p>Particulate emissions (PE) from the baghouse stack shall not exceed 1.1 pounds per hour and 4.8 tons per year.</p> <p>PE less than 10 microns (PM10) shall not exceed 0.8 pound per hour and 3.5 tons per year.</p> <p>PE from the baghouse shall not exceed 0.005 grain/scf.</p> <p>There shall be no visible fugitive particulate emissions escaping from the building housing this emissions unit.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p>
	OAC rule 3745-17-07(A)	<p>See A.II.1 below.</p> <p>Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.</p>
	OAC rule 3745-17-11(B)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a** There shall be no visible fugitive particulate emissions from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** The permittee shall vent the particulate emissions from the conveyors, mills, and screens to the baghouse controlling this emissions unit.

II. Operational Restrictions

- 1.** The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from any non-stack egress points from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

Particulate emissions from the baghouse stack shall not exceed 1.1 pounds per hour. PM10 emissions from the baghouse stack shall not exceed 0.8 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit and within 180 days prior to the permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. Concurrent visible emissions observations at each non-stack egress points from the building housing this emissions unit shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitations:

Particulate emissions shall not exceed 4.8 tons per year. PM10 emissions shall not exceed 3.5 tons per year.

Applicable Compliance Method:

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (the annual limitations were calculated by multiplying the hourly limitations by 8760, and then dividing by 2000).

V. Testing Requirements (continued)

1.c Emission Limitation:

Particulate emissions from the baghouse stack shall not exceed 0.005 grain/scf. PM10 emissions from the baghouse stack shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Compliance shall be determined through the emission testing required in Section A.V.1.a of this permit.

1.d Emission Limitation:

There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.e Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spreader Test Area (P102)
Activity Description: Physical quality check of production material, Analytical Lab

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
manual testing of spreaders including hand loading of fertilizer, vented to three baghouses	OAC rule 3745-17-07(A)	Visible particulate emissions from each baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions from the baghouse stacks combined shall not exceed 2.58 pounds per hour, based on Table I. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II does not apply because the uncontrolled mass rate of emissions from this emissions unit is less than 10 pounds per hour.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the loading of fertilizer into spreaders to the baghouses controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate each baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each baghouse stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

*This emissions unit operates very infrequently (approximately 500 hours per year); therefore, a monthly visible check is deemed to be reasonable for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from each baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
Visible particulate emissions from each baghouse shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

- 1.b Emission Limitation:
Particulate emissions from the baghouse stacks combined shall not exceed 2.58 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly particulate emission rate may be determined by multiplying the maximum hourly production of the process of 0.5 ton per hour by an emission factor of 0.2 lb particulates per ton of raw material (RACM for Fertilizer Mixing/Blending Plants, Table 2.12-1, 1983). The resulting uncontrolled emission rate shall be multiplied by the assumed baghouse control efficiency of 99% (1-.99) to obtain the controlled hourly particulate emission rate.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Facility Name: **The Scotts Company, Marysville Chem Plant**
Facility ID: **01-80-01-0008**
Emissions Unit: **Spreader Test Area (P102)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pilot Plant Equipment (P103)

Activity Description: Pilot plant process. R&D activity for small scale production of fertilizer products.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pilot plant process for small scale production of fertilizer products with mills, feeders, dryer, elevators, and conveyors, vented to a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions from the baghouse stack shall not exceed 2.91 pounds per hour based on Table I. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II does not apply because the uncontrolled mass rate of emissions from this emissions unit is less than 10 pounds per hour.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the mills, feeders, dryer, elevators, and conveyors of the pilot plant to the baghouse controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each baghouse stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

*This emissions unit operates very infrequently (approximately 500 hours per year); therefore, a monthly visible check is deemed to be reasonable for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.
 - 1.b Emission Limitation:
Particulate emissions from the baghouse stack shall not exceed 2.91 pounds per hour.

Applicable Compliance Method:
Compliance with the hourly particulate emission limitation may be determined by multiplying the maximum hourly production of the process of 0.6 ton per hour by an emission factor of 0.2 lb particulates per ton of raw material (RACM for Fertilizer Mixing/Blending Plants, Table 2.12-1, 1983). The resulting uncontrolled emission rate shall be multiplied by the assumed baghouse control efficiency of 99% (1-.99) to obtain the controlled hourly particulate emission rate.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pilot Plant Resin Phase (P104)

Activity Description: Kettles and Feeders

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pilot plant kettles and feeders, vented to a wet scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions from the scrubber stack shall not exceed 2.91 pounds per hour based on Table I. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II does not apply because the uncontrolled mass rate of emissions from this emissions unit is less than 10 pounds per hour.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the pilot plant kettles and feeders to the wet scrubber controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the wet scrubber whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each baghouse stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

*This emissions unit operates very infrequently (approximately 500 hours per year); therefore, a monthly visible check is deemed to be reasonable for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the scrubber stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

- 1.b Emissions Limitation:
Particulate emissions from the scrubber stack shall not exceed 2.91 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly particulate emission limitation may be determined by multiplying the maximum hourly production of the process of 0.6 ton per hour by an emission factor of 0.2 lb particulates/ton of raw material (RACM for Fertilizer Mixing/Blending Plants, Table 2.12-1, 1983). The resulting uncontrolled emission rate shall be multiplied by the assumed scrubber control efficiency of 98% (1-.98) to obtain the controlled hourly particulate emission rate.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Facility Name: **The Scotts Company, Marysville Chem Plant**
Facility ID: **01-80-01-0008**
Emissions Unit: **Pilot Plant Resin Phase (P104)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Central Vacuum System (Systems 1 and 2) (P105)

Activity Description: Mixed fertilizer vacuum for point pickup

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
mixed fertilizer vacuum for point pickup, vented to a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions from the baghouse stack shall not exceed 3.38 pounds per hour based on Table I. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II does not apply because the uncontrolled mass rate of emissions from this emissions unit is less than 10 pounds per hour.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions to the baghouse whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.b Emission Limitation:

Particulate emissions from the baghouse stack shall not exceed 3.38 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Combination Products System #1 (P109)

Activity Description: Pesticide melting and mixing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
combination products System 1 pesticide melting and mixing, vented to an impingement scrubber	OAC rule 3745-21-07(G)	Exempt, see A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. To ensure that Figure II will not be applicable, the uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.
		See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a This emissions unit currently does not employ any liquid organic materials as defined in OAC rule 3745-21-01(C)(3). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G). (The pesticides melted in this emissions unit are solid technical grade pesticides at standard conditions.)
- 2.b If emission testing for this emissions unit demonstrates that the allowable particulate emission rate from Figure II is more stringent than 10 lbs/hour, the permittee shall comply with the more stringent limitation.
- 2.c The permittee shall vent all the particulate emissions to the scrubber whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the scrubber whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

2. The permittee shall maintain daily records of the hours of operation of this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. Prior to employing any liquid organic material in this emissions unit, including any cleanup material that is a photochemically reactive material, the permittee shall provide written notification to the Ohio EPA, Central District Office. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour, and pounds per day.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

V. Testing Requirements (continued)

1.b Emissions Limitation:

The uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate emission limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 6 months of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates. Emission tests shall also be performed at the inlet of the control device for purposes of determining the uncontrolled mass emission rate of emissions (UMRE) and the allowable emission rate from Figure II of OAC rule 3745-17-11.
- iii. The following test method(s) shall be employed for the UMRE to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

1.c Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dry Chemical Processing (P110)

Activity Description: Ferrous sulfate handling system

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
ferrous sulfate handling system with screens, elevator, conveyor and surge bins, vented to a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. To ensure that Figure II will not be applicable, the uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.
		See A.I.2.c below.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c If emission testing for this emissions unit demonstrates that the allowable particulate emission rate from Figure II is more stringent than 10 lbs/hour, the permittee shall comply with the more stringent limitation.
- 2.d The permittee shall vent the particulate emissions from the screens, elevator, conveyor, and surge bins to the baghouse controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

V. Testing Requirements (continued)

1.b Emissions Limitation:

The uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate emission limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 6 months of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates. Emission tests shall also be performed at the inlet of the control device for purposes of determining the uncontrolled mass emission rate of emissions (UMRE) and the allowable emission rate from Figure II of OAC rule 3745-17-11.
- iii. The following test method(s) shall be employed for the UMRE to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System 2 Resin Kettles (P113)
Activity Description: Resin phase for fertilizer production.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Systems 1 and 2 resin kettles for fertilizer production vented to a wet scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. To ensure that Figure II will not be applicable, the uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.
		See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a If emission testing for this emissions unit demonstrates that the allowable particulate emission rate from Figure II is more stringent than 10 pounds/hour, the permittee shall comply with the more stringent limitation.
- 2.b The permittee shall vent all the particulate emissions to the wet scrubber whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the wet scrubber whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

V. Testing Requirements (continued)

1.b Emission Limitation:

The uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate emission limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 6 months of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates. Emission tests shall also be performed at the inlet of the control device for purposes of determining the uncontrolled mass emission rate of emissions (UMRE) and the allowable emission rate from Figure II of OAC rule 3745-17-11.
- iii. The following test method(s) shall be employed for the UMRE to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Control Products - Pesticide Process (P115)

Activity Description: kettles

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pesticide products processing including elevators, conveyors, blenders, kettles, surge bins, and screens, vented to a cyclone and wet scrubber	OAC rule 3745-21-07(G)	Exempt, see A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. To ensure that Figure II will not be applicable, the uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.
	OAC rule 3745-17-08(B)	See A.I.2.d below.
	OAC rule 3745-17-07(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a This emissions unit currently does not employ any liquid organic materials as defined in OAC rule 3745-21-01(C)(3). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G). (The pesticides melted in this emissions unit are solid technical grade pesticides at standard conditions.)
- 2.b Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

2. Additional Terms and Conditions (continued)

- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** If the emissions testing for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 10 lbs/hour, the permittee shall comply with the more stringent limitation.
- 2.e** The permittee shall vent the particulate emissions from the elevators, conveyors, blenders, kettles, surge bins, and screens to the cyclone and wet scrubber controlling this emissions unit.

II. Operational Restrictions

- 1.** The permittee shall operate the cyclone and wet scrubber whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions; and
 - b. whether the emissions are representative of normal operations; and
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions; and
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

- 2.** The permittee shall maintain daily records of the hours of operation of this emissions unit.

IV. Reporting Requirements

- 1.** The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the scrubber stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 2.** Prior to employing any liquid organic material in this emissions unit, including any cleanup material that is a photochemically reactive material, the permittee shall provide written notification to the Ohio EPA, Central District office. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour, and pounds per day.

V. Testing Requirements

- 1.** Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

1.b Emission Limitation:

The uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate emission limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 6 months of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates. Emission tests shall also be performed at the inlet of the control device for purposes of determining the uncontrolled mass emission rate of emissions (UMRE) and the allowable emission rate from Figure II of OAC rule 3745-17-11.
- iii. The following test method(s) shall be employed for the UMRE to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mon-A-Mon, Potash & Vermiculite Ore Unloading (P134)
Activity Description: Raw Material Unloading system

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
monammonium and potash material unloading system with hopper, conveyors, screens, mills, and surge bins, vented to three baghouses	OAC rule 3745-17-07(A)	Visible particulate emissions from each baghouse shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions from the baghouse stacks combined shall not exceed 6.52 pounds per hour based on Table I. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II does not apply because the uncontrolled mass rate of emissions from this emissions unit is less than 10 pounds per hour.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the hopper, conveyors, screens, mills, and surge bins to the baghouses controlling this emissions unit.

II. Operational Restrictions

1. The permittee shall operate the baghouse corresponding to each unloading line whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
Visible particulate emissions from each baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

V. Testing Requirements (continued)

1.b Emission Limitation:

Particulate emissions from the three baghouse stacks combined shall not exceed 6.52 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate emission limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: MURP Granulation Drum (P138)
Activity Description: System 1, MURP granulation drum

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Trionized System 1, MURP granulation drum and process cooler vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-3522)	Particulate emissions from the baghouse stack shall not exceed 2.5 pounds per hour.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-11(B)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall vent all the particulate emissions to the baghouse whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Particulate emissions from the baghouse stack shall not exceed 2.5 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. Concurrent visible emissions observations at the stack egress point shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 22. At a minimum, three 15-minute observation periods shall be conducted for each one hour run of the Method 5 test. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.

Emissions testing was conducted for this emissions unit on May 6 and 7, 1997 and demonstrated compliance with this emission limitation.

- 1.b Emission Limitation:
Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

Facility Name: **The Scotts Company, Marysville Chem Plant**
Facility ID: **01-80-01-0008**
Emissions Unit: **MURP Granulation Drum (P138)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Trionized System 1, MURP granulation drum and process cooler with cyclone	OAC rule 3745-31-05(D) (PTI 01-3522)	NH3 emissions from the cyclone stack shall not exceed 30.0 pounds per hour.

See B.I.2.a below.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:

NH₃ emissions from the cyclone stack shall not exceed 30.0 pounds per hour.

Applicable Compliance Method:

To determine compliance with the hourly NH₃ emissions limit limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within approximately 2.5 years of the issuance of this permit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Resin Reactor System (P139)
Activity Description: System 1 resin reactor system

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Trionized System 1, resin reactor system vented to a wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 01-3522)	Particulate emissions from the scrubber stack shall not exceed 0.3 pound per hour. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- The permittee shall vent all the particulate emissions to the wet scrubber whenever this emissions unit is in operation.
- The wet scrubber controlling the emissions from this emissions unit also controls the emissions from emissions unit P113 (Systems 1 and 2 resin kettles). Emissions unit P113 is an existing source with an allowable particulate emission limitation of 10 pounds per hour. Process operations required that both of these emissions units must be in operation at the same time; therefore, they cannot be operated independently for the purpose of testing each emissions unit separately. The combined particulate emission limitation for P113 and P139 (10.3 lbs/hr) is sufficiently greater than the emission limitation for P139 alone (0.3 lb/hr). Therefore, compliance with the particulate emission limitation for P139 may be assumed and emission testing for P139 is not required.

II. Operational Restrictions

- The permittee shall operate the wet scrubber whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the scrubber stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Particulate emissions from the scrubber stack shall not exceed 0.3 pound per hour.

Applicable Compliance Method:

Compliance with the hourly particulate emission limit may be determined by multiplying the maximum hourly production of the process of 10 ton per hour by an emission factor of 0.2 lb particulates per ton of raw material (RACM for Fertilizer Mixing/Blending Plants, Table 2.12-1, 1983). The resulting uncontrolled emission rate shall be multiplied by the assumed wet scrubber control efficiency of 90% (1-.90) to obtain the controlled hourly particulate emission rate.

- 1.b Emission Limitation:
Visible particulate emissions from the scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Trionized System 1, resin reactor system with wet scrubber	OAC rule 3745-31-05(D) (PTI 01-3522)	NH3 emissions from the scrubber stack shall not exceed 57.0 pounds per hour. See B.I.2.a below.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established and permitted under OAC rule 3745-31-05(D) due to an appeal settlement of PTI #01-7992, issued December 27, 2001. NH3 is an air toxic, and the hourly emission limitation was established to reflect the status quo NH3 emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:

NH3 emissions from the scrubber stack shall not exceed 57.0 pounds per hour.

Applicable Compliance Method:

Emission testing was conducted for this emissions unit on November 22, 1994. The emission test demonstrated compliance with the NH3 emission limitation for this emissions unit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Product Milling & Screening (P140)
Activity Description: System 1 product milling and screening

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 1 product milling and screening including elevators, screens, mills and conveyors, vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-6869)	Particulate emissions from the baghouse stack shall not exceed 0.6 pound per hour and 2.63 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.c The permittee shall vent the particulate emissions from the elevators, mills, screens, and conveyors to the baghouse controlling this emissions unit.

II. Operational Restrictions

1. The maximum average hourly production rate for this emissions unit shall not exceed 40,620 pounds per hour.
2. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that include the following:
 - a. the amount of product processed in this emissions unit (in pounds);
 - b. the number of hours the emissions unit was operated; and
 - c. the average amount of product processed per hour (a/b).
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions; and
 - b. whether the emissions are representative of normal operations; and
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions; and
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. In accordance with paragraph A.1.c.ii. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly production rate limitation specified in Section A.II.1, as well as the corrective actions that were taken to achieve compliance.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

Particulate emissions from the baghouse stack shall not exceed 0.6 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate emission limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months prior to the expiration of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Emissions testing was conducted for this emissions unit on May 6 and 7, 1997 and demonstrated compliance with this emission limitation.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

Particulate emissions from the baghouse stack shall not exceed 2.63 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation was established by multiplying the hourly emission limitation by the maximum hours of production per year (8,760) and dividing by 2,000 pounds per ton. Therefore, if the emissions unit is in compliance with the hourly emission limitation, it is also in compliance with the annual limitation.

V. Testing Requirements (continued)

1.c Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Product Cooler (P141)
Activity Description: System 1 product cooler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System 1 product cooler and conveyor vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 01-3522)	Particulate emissions from the baghouse stack shall not exceed 0.06 pound per hour.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall vent all the particulate emissions to the baghouse whenever this emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Particulate emissions from the baghouse stack shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

To determine compliance with the hourly particulate emission limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months of permit expiration.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

1.b Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Bifenthrin Storage Tank (T012)
Activity Description: 16,400 gallon bifenthrin pesticide storage tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
16,400-gallon bifenthrin pesticide storage tank	OAC rule 3745-31-05(A)(3) (PTI 01-8386)	Organic compound (OC) emissions shall not exceed 0.19 ton per year.
	40 CFR 60, Subpart Kb	See A.I.2.a below. See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a This emissions unit shall employ submerged fill at all times.
- 2.b In accordance with 40 CFR 60.116b (a) and (b), the owner of the tank shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing its capacity for the life of the storage vessel.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:

OC emissions shall not exceed 0.19 ton per year.

Applicable Compliance Method:

Total OC emissions from the storage tank may be determined using the most recent version of US EPA's "Tanks" program. The annual OC emission limitation was based on an estimated maximum annual throughput of the storage tank (5,986,000 gallons of bifenthrin).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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