



7/3/2014

Certified Mail

Mr. Brad Kelley  
Mane Inc  
1093 Mane Way  
Lebanon, OH 45036

No	TOXIC REVIEW
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1431004502  
Permit Number: P0116247  
Permit Type: Initial Installation  
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Mane Inc**

Facility ID:	1431004502
Permit Number:	P0116247
Permit Type:	Initial Installation
Issued:	7/3/2014
Effective:	7/3/2014
Expiration:	7/3/2019





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Mane Inc

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## Authorization

Facility ID: 1431004502  
Application Number(s): A0049917, A0050340  
Permit Number: P0116247  
Permit Description: Initial installation of four liquid flavor blend tanks: 10,000-liter blend tank (P001), 6,000-liter blend tank (P002), 2,000-liter blend tank (P003), and 2,000-liter blend tank (P004).  
Permit Type: Initial Installation  
Permit Fee: \$1,400.00  
Issue Date: 7/3/2014  
Effective Date: 7/3/2014  
Expiration Date: 7/3/2019  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Mane Inc  
10261 Chester Rd  
Cincinnati, OH 45215

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

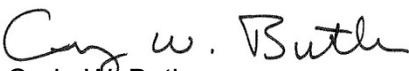
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0116247

Permit Description: Initial installation of four liquid flavor blend tanks: 10,000-liter blend tank (P001), 6,000-liter blend tank (P002), 2,000-liter blend tank (P003), and 2,000-liter blend tank (P004).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Liquid Flavor Blend Tank 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Liquid Flavor Blend Tank 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: 2000 L Blend Tanks**

<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Liquid Flavor Blend Tank 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Liquid Flavor Blend Tank 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**

Mane Inc

**Permit Number:** P0116247

**Facility ID:** 1431004502

**Effective Date:** 7/3/2014

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**

Mane Inc

**Permit Number:** P0116247

**Facility ID:** 1431004502

**Effective Date:** 7/3/2014

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Mane Inc

**Permit Number:** P0116247

**Facility ID:** 1431004502

**Effective Date:** 7/3/2014

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



## **C. Emissions Unit Terms and Conditions**



1. P001, Liquid Flavor Blend Tank 1

Operations, Property and/or Equipment Description:

10,000 Liter Liquid Flavor Blend Tank 1

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)a., c)(1), c)(2), d)(1), e)(2), f)(1)a., f)(2), and f)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3)	See c)(2).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The permittee shall install a venturi scrubber with a design control efficiency of at least 70% control of particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions. See b)(2)b., d)(3), d)(4), and e)(1).
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-31-05(D)  <i>Synthetic Minor to Avoid Title V and New Source Review Applicability</i>	See b)(2)a., c)(1), c)(2) d)(1), e)(2), f)(1)a., f)(2), and f)(3).
e.	OAC rule 3745-17-07(A)(1)	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.  See b)(2)e.

(2) Additional Terms and Conditions

- a. Volatile organic compound (VOC) emissions from emissions units P001 – P004, combined, shall not exceed 89.8 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (tons)</u>
1	8.98
1-2	17.96
1-3	26.94
1-4	35.92
1-5	44.9
1-6	53.88
1-7	62.86
1-8	71.84
1-9	80.82
1-10	89.8
1-11	89.8
1-12	89.8

After the first 12 calendar months of operation, compliance with the annual VOC emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code



(ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions from this air contaminant source since the uncontrolled potential to emit for PE and PM10 is less than 10 tons per year.

- d. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.
- e. The uncontrolled potential to emit particulate emissions from this emissions unit is greater than the allowable emission limit pursuant to OAC rule 3745-17-11(B). The permittee shall control particulate emissions to a level which is in compliance with the rule-based emission limitation.

c) **Operational Restrictions**

- (1) The maximum daily throughput rate for emissions unit P001 shall not exceed 32,000 liters per day.

The daily operational restriction is equal to the emissions unit's maximum potential throughput. Therefore, no records are required to demonstrate compliance with this daily operational restriction.

- (2) The maximum annual VOC input rate for emissions units P001 – P004, combined, shall not exceed 8,980 TPY, based upon a rolling, 12-month summation of the monthly VOC input rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the VOC input levels specified in the following table:



<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC input (tons)</u>
1	898
1-2	1,796
1-3	2,694
1-4	3,592
1-5	4,490
1-6	5,388
1-7	6,286
1-8	7,184
1-9	8,082
1-10	8,980
1-11	8,980
1-12	8,980

After the first 12 calendar months of operation, compliance with the annual VOC input rate limitation shall be based upon a rolling, 12-month summation of the monthly VOC input rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P001 – P004, combined:
  - a. the identification of each product produced;
  - b. the input rate of raw materials of each product produced, in liters per month;
  - c. the VOC content of raw materials of each product produced, in pounds per liter;
  - d. the total VOC input for each month of operations, in tons (the summation of the results of the value from line b. multiplied by the value from line c. for each product produced, then divided by 2000 lbs/ton);
  - e. the total VOC emission rate for each month of operations (assuming 1 percent of the VOC input value from line d. is emitted to the air);



- f. beginning after the first 12 calendar months of operation, the updated rolling, 12-month summation of the VOC input rates; and
- g. beginning after the first 12 calendar months of operation, the updated rolling, 12-month summation of the VOC emissions.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative VOC input rate and VOC emissions for each calendar month.

- (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 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

- (3) The permittee shall develop and implement maintenance procedures for the venturi scrubber to ensure the equipment continues to operate as designed. The permittee shall begin following the maintenance procedures within 30 days from the date the Southwest Ohio Air Quality Agency approved the initial procedures. As needs warrant, these maintenance procedures may be modified at the request of the Southwest Ohio Air Quality Agency or the company. Proposed revisions to the maintenance procedures shall be submitted to the Southwest Ohio Air Quality Agency and can only be implemented after the Southwest Ohio Air Quality Agency's approval.



- (4) The permittee shall maintain records of the following information:
- a. the date and description of any maintenance and/or repairs performed on the venturi scrubber; and
  - b. a copy of the approved maintenance procedures for the venturi scrubber.

These records shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range or limit for the pressure drop across the scrubber and the scrubber liquid flow rate shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.
- (6) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's flow rate on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable range or limit for the pressure drop across the scrubber and the scrubber liquid flow rate shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

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

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

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



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

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

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

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed maintenance procedures for the venturi scrubber to the Southwest Ohio Air Quality Agency for approval.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month emission limitation for VOC outlined in b)(2)a. and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative emission levels;
    - ii. all exceedances of the rolling, 12-month VOC input rate limitation outlined in c)(2) and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative VOC input rate levels; and
    - iii. all exceedances of the daily throughput rate limitation outlined in c)(1).
  - b. the probable cause of each deviation (excursion);



- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - a. The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2) above:
    - i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
    - ii. any corrective actions taken to minimize or eliminate the visible particulate emissions.
  - b. The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the venturi scrubber during the 12-month reporting period for this emissions unit:
    - i. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
    - ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
    - iii. each incident of deviation described in "(3)b.i." or "(3)b.ii." (above) where a prompt investigation was not conducted;
    - iv. each incident of deviation described in "(3)b.i." or "(3)b.ii." where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and



- v. each incident of deviation described in “ (3)b.i.” or “(3)b.ii.” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- f) **Testing Requirements**
- (1) Compliance with the Emission Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. **Emission Limitation:**

Volatile organic compound (VOC) emissions from emissions units P001 – P004, combined, shall not exceed 89.8 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

**Applicable Compliance Method:**

Compliance with the rolling, 12-month VOC emission limitation shall be determined by compliance with the rolling, 12-month VOC input operational restriction specified in c)(2) and the record keeping requirements specified in d)(1).

The rolling, 12-month VOC emission limitation is based on the uncontrolled potential to emit from emissions units P001 – P004, combined, when taking into consideration the operational restriction in c)(2). The rolling, 12-month VOC emission limitation was calculated by the following equation using the information submitted by the permittee in the application for PTIO P0116247, submitted on February 6, 2014:

$$\text{VOC} = (8,980 \text{ tons per year allowable VOC input}) \times (1\%, \text{ VOC emission factor supplied by permittee}) = 89.8 \text{ TPY}.$$



b. Control Requirement:

The permittee shall install a venturi scrubber with a design control efficiency of at least 70% control of particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions.

Applicable Compliance Method:

Compliance with the design control efficiency requirement shall be based upon the company supplied design estimate as supplied in the application for PTIO P0116247, submitted on February 6, 2014.

c. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The rule-based PE limitation is based upon the permittee-supplied maximum process weight rate of dry material only for the emissions unit and OAC rule 3745-17-11, Table I.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

(2) The daily throughput restriction specified in c)(1) is equal to this emissions unit's maximum potential throughput based upon the information submitted by the permittee in the application for PTIO P0116247, submitted on February 6, 2014.

(3) Compliance with the rolling, 12-month VOC input restriction specified in c)(2) shall be determined by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



2. P002, Liquid Flavor Blend Tank 2

Operations, Property and/or Equipment Description:

6,000 Liter Liquid Flavor Blend Tank 2

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)a., c)(1), c)(2), d)(1), e)(2), f)(1)a., f)(2), and f)(3).
- b) Applicable Emission Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3)	See c)(2).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The permittee shall install a venturi scrubber with a design control efficiency of at least 70% control of particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions.  See b)(2)b., d)(3), d)(4), and e)(1).
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-31-05(D)  <i>Synthetic Minor to Avoid Title V and New Source Review Applicability</i>	See b)(2)a., c)(1), c)(2) d)(1), e)(2), f)(1)a., f)(2), and f)(3).
e.	OAC rule 3745-17-07(A)(1)	See b)(2)d.
f.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.



(2) Additional Terms and Conditions

- a. Volatile organic compound (VOC) emissions from emissions units P001 – P004, combined, shall not exceed 89.8 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (tons)</u>
1	8.98
1-2	17.96
1-3	26.94
1-4	35.92
1-5	44.9
1-6	53.88
1-7	62.86
1-8	71.84
1-9	80.82
1-10	89.8
1-11	89.8
1-12	89.8

After the first 12 calendar months of operation, compliance with the annual VOC emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA



approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions from this air contaminant source since the uncontrolled potential to emit for PE and PM10 is less than 10 tons per year.

- d. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

c) Operational Restrictions

- (1) The maximum daily throughput rate for emissions unit P002 shall not exceed 22,200 liters per day.

The daily operational restriction is equal to the emissions unit's maximum potential throughput. Therefore, no records are required to demonstrate compliance with this daily operational restriction.

- (2) The maximum annual VOC input rate for emissions units P001 – P004, combined, shall not exceed 8,980 TPY, based upon a rolling, 12-month summation of the monthly VOC input rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the VOC input levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC input (tons)</u>
1	898
1-2	1,796
1-3	2,694
1-4	3,592
1-5	4,490
1-6	5,388
1-7	6,286
1-8	7,184



1-9	8,082
1-10	8,980
1-11	8,980
1-12	8,980

After the first 12 calendar months of operation, compliance with the annual VOC input rate limitation shall be based upon a rolling, 12-month summation of the monthly VOC input rates.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information for emissions units P001 – P004, combined:
  - a. the identification of each product produced;
  - b. the input rate of raw materials of each product produced, in liters per month;
  - c. the VOC content of raw materials of each product produced, in pounds per liter;
  - d. the total VOC input for each month of operations, in tons (the summation of the results of the value from line b. multiplied by the value from line c. for each product produced, then divided by 2000 lbs/ton);
  - e. the total VOC emission rate for each month of operations (assuming 1 percent of the VOC input value from line d. is emitted to the air);
  - f. beginning after the first 12 calendar months of operation, the updated rolling, 12-month summation of the VOC input rates; and
  - g. beginning after the first 12 calendar months of operation, the updated rolling, 12-month summation of the VOC emissions.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative VOC input rate and VOC emissions for each calendar month.

- (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 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

- (3) The permittee shall develop and implement maintenance procedures for the venturi scrubber to ensure the equipment continues to operate as designed. The permittee shall begin following the maintenance procedures within 30 days from the date the Southwest Ohio Air Quality Agency approved the initial procedures. As needs warrant, these maintenance procedures may be modified at the request of the Southwest Ohio Air Quality Agency or the company. Proposed revisions to the maintenance procedures shall be submitted to the Southwest Ohio Air Quality Agency and can only be implemented after the Southwest Ohio Air Quality Agency's approval.
- (4) The permittee shall maintain records of the following information:
  - a. the date and description of any maintenance and/or repairs performed on the venturi scrubber; and
  - b. a copy of the approved maintenance procedures for the venturi scrubber.

These records shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed maintenance procedures for the venturi scrubber to the Southwest Ohio Air Quality Agency for approval.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month emission limitation for VOC outlined in b)(2)a. and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative emission levels;



- ii. all exceedances of the rolling, 12-month VOC input rate limitation outlined in c)(2) and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative VOC input rate levels; and
- iii. all exceedances of the daily throughput rate limitation outlined in c)(1).
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - a. The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2) above:
    - i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
    - ii. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid



electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

(1) Compliance with the Emission Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compound (VOC) emissions from emissions units P001 – P004, combined, shall not exceed 89.8 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined by compliance with the rolling, 12-month VOC input operational restriction specified in c)(2) and the record keeping requirements specified in d)(1).

The rolling, 12-month VOC emission limitation is based on the uncontrolled potential to emit from emissions units P001 – P004, combined, when taking into consideration the operational restriction in c)(2). The rolling, 12-month VOC emission limitation was calculated by the following equation using the information submitted by the permittee in the application for PTIO P0116247, submitted on February 6, 2014:

$$\text{VOC} = (8,980 \text{ tons per year allowable VOC input}) \times (1\%, \text{ VOC emission factor supplied by permittee}) = 89.8 \text{ TPY.}$$

b. Control Requirement:

The permittee shall install a venturi scrubber with a design control efficiency of at least 70% control of particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions.

Applicable Compliance Method:

Compliance with the design control efficiency requirement shall be based upon the company supplied design estimate as supplied in the application for PTIO P0116247, submitted on February 6, 2014.

c. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The rule-based PE limitation is based upon the permittee-supplied maximum process weight rate of dry material only for the emissions unit and OAC rule 3745-17-11, Table I.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

- (2) The daily throughput restriction specified in c)(1) is equal to this emissions unit's maximum potential throughput based upon the information submitted by the permittee in the application for PTIO P0116247, submitted on February 6, 2014.
- (3) Compliance with the rolling, 12-month VOC input restriction specified in c)(2) shall be determined by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.



**3. Emissions Unit Group - 2000 L Blend Tanks: P003 and P004**

EU ID	Operations, Property and/or Equipment Description
P003	2,000 Liter Liquid Flavor Blend Tank 3
P004	2,000 Liter Liquid Flavor Blend Tank 4

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)a., c)(1), c)(2), d)(1), e)(2), f)(1)a., f)(2), and f)(3).

b) Applicable Emission Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
a.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3)	See c)(2).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The permittee shall install a venturi scrubber with a design control efficiency of at least 70% control of particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions. See b)(2)b., d)(3), d)(4), and e)(1).
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-31-05(D)  <i>Synthetic Minor to Avoid Title V and New Source Review Applicability</i>	See b)(2)a., c)(1), c)(2) d)(1), e)(2), f)(1)a., f)(2), and f)(3).
e.	OAC rule 3745-17-07(A)(1)	See b)(2)d.
f.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.



(2) Additional Terms and Conditions

- a. Volatile organic compound (VOC) emissions from emissions units P001 – P004, combined, shall not exceed 89.8 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (tons)</u>
1	8.98
1-2	17.96
1-3	26.94
1-4	35.92
1-5	44.9
1-6	53.88
1-7	62.86
1-8	71.84
1-9	80.82
1-10	89.8
1-11	89.8
1-12	89.8

After the first 12 calendar months of operation, compliance with the annual VOC emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA



approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions from this air contaminant source since the uncontrolled potential to emit for PE and PM10 is less than 10 tons per year.

- d. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The presence of water vapor in the scrubber plume does not constitute visible emissions.

c) Operational Restrictions

- (1) The maximum daily throughput rate for this emissions unit shall not exceed 9,700 liters per day.

The daily operational restriction is equal to the emissions unit's maximum potential throughput. Therefore, no records are required to demonstrate compliance with this daily operational restriction.

- (2) The maximum annual VOC input rate for emissions units P001 – P004, combined, shall not exceed 8,980 TPY, based upon a rolling, 12-month summation of the monthly VOC input rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the VOC input levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC input (tons)</u>
1	898
1-2	1,796
1-3	2,694
1-4	3,592
1-5	4,490
1-6	5,388
1-7	6,286
1-8	7,184



1-9	8,082
1-10	8,980
1-11	8,980
1-12	8,980

After the first 12 calendar months of operation, compliance with the annual VOC input rate limitation shall be based upon a rolling, 12-month summation of the monthly VOC input rates.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information for emissions units P001 - P004, combined:
  - a. the identification of each product produced;
  - b. the input rate of raw materials of each product produced, in liters per month;
  - c. the VOC content of raw materials of each product produced, in pounds per liter;
  - d. the total VOC input for each month of operations, in tons (the summation of the results of the value from line b. multiplied by the value from line c. for each product produced, then divided by 2000 lbs/ton);
  - e. the total VOC emission rate for each month of operations (assuming 1 percent of the VOC input value from line d. is emitted to the air);
  - f. beginning after the first 12 calendar months of operation, the updated rolling, 12-month summation of the VOC input rates; and
  - g. beginning after the first 12 calendar months of operation, the updated rolling, 12-month summation of the VOC emissions.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative VOC input rate and VOC emissions for each calendar month.

- (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 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

- (3) The permittee shall develop and implement maintenance procedures for the venturi scrubber to ensure the equipment continues to operate as designed. The permittee shall begin following the maintenance procedures within 30 days from the date the Southwest Ohio Air Quality Agency approved the initial procedures. As needs warrant, these maintenance procedures may be modified at the request of the Southwest Ohio Air Quality Agency or the company. Proposed revisions to the maintenance procedures shall be submitted to the Southwest Ohio Air Quality Agency and can only be implemented after the Southwest Ohio Air Quality Agency's approval.

- (4) The permittee shall maintain records of the following information:

- a. the date and description of any maintenance and/or repairs performed on the venturi scrubber; and
- b. a copy of the approved maintenance procedures for the venturi scrubber.

These records shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed maintenance procedures for the venturi scrubber to the Southwest Ohio Air Quality Agency for approval.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. all exceedances of the rolling, 12-month emission limitation for VOC outlined in b)(2)a. and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative emission levels;



- ii. all exceedances of the rolling, 12-month VOC input rate limitation outlined in c)(2) and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative VOC input rate levels; and
- iii. all exceedances of the daily throughput rate limitation outlined in c)(1).
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - a. The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2) above:
    - i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
    - ii. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid



electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

(1) Compliance with the Emission Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Volatile organic compound (VOC) emissions from emissions units P001 – P004, combined, shall not exceed 89.8 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined by compliance with the rolling, 12-month VOC input operational restriction specified in c)(2) and the record keeping requirements specified in d)(1).

The rolling, 12-month VOC emission limitation is based on the uncontrolled potential to emit from emissions units P001 – P004, combined, when taking into consideration the operational restriction in c)(2). The rolling, 12-month VOC emission limitation was calculated by the following equation using the information submitted by the permittee in the application for PTIO P0116247, submitted on February 6, 2014:

$$\text{VOC} = (8,980 \text{ tons per year allowable VOC input}) \times (1\%, \text{ VOC emission factor supplied by permittee}) = 89.8 \text{ TPY.}$$

b. Control Requirement:

The permittee shall install a venturi scrubber with a design control efficiency of at least 70% control of particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions.

Applicable Compliance Method:

Compliance with the design control efficiency requirement shall be based upon the company supplied design estimate as supplied in the application for PTIO P0116247, submitted on February 6, 2014.

c. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The rule-based PE limitation is based upon the permittee-supplied maximum process weight rate of dry material only for the emissions unit and OAC rule 3745-17-11, Table I.

If required, compliance shall be determined through emission testing performed in accordance with U.S. EPA Methods 1-5.

- (2) The daily throughput restriction specified in c)(1) is equal to this emissions unit's maximum potential throughput based upon the information submitted by the permittee in the application for PTIO P0116247, submitted on February 6, 2014.
- (3) Compliance with the rolling, 12-month VOC input restriction specified in c)(2) shall be determined by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.