

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install: 14-05875

**A. Source Description**

This company is a flavoring facility that provides flavors to the customer specification. A complaint was traced by Hamilton County Environmental Services inspectors to Mane Inc where it was discovered that four process mix tanks were in operation without permits. Flavoring is poured into the mixing vessels and mixed which results in Organic Compounds (OC) emissions. The flavoring is then poured into totes or other transport vessels which are shipped to the customer. There are no control devices associated with the process mixing tanks. The facility also has several dry mixing vessels that are vented through a fabric filter and back into the building. These sources have been determined to be de minimus for particulate emissions.

**B. Facility Emissions and Attainment Status**

The facility is located in Hamilton County which is non-attainment for ozone and PM2.5 and attainment for all other pollutants. The potential to emit for the OC emissions is 146 TPY. Mane Inc. is requesting federally enforceable limitations through a synthetic minor permit to keep the allowable emissions below Nonattainment New Source Review permitting thresholds. The facility's total actual OC emissions are below 5 TPY of OC.

**C. Source Emissions**

The allowable OC emissions for source P001 will be 7.75 pounds per hour. The allowable OC emissions for source P002 will be 5.63 pounds per hour. The allowable OC emissions for source P003 will be 8.16 pounds per hour. The allowable OC emissions for source P004 will be 11.73 pounds per hour. The combined allowable OC emissions for sources P001, P002, P003 and P004 will be 20.0 tons per year.

**D. Conclusion**

The facility will demonstrate compliance with permit limitations by recording production and emissions rates on a monthly basis and compiling the data into rolling, 12-month records. The facility will also submit quarterly exceedance reports. Since the emissions units were installed prior to the enactment of Senate Bill 265, Best Available Technology (BAT) applies and has been determined to be compliance with all applicable regulations and emissions limitations. The facility will comply with synthetic minor permit emissions limitations of 20.0 TPY of OC to avoid Nonattainment New Source Review.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
CLERMONT COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No:** 14-05875

**Fac ID:** 1413080481

**DATE:** 10/24/2006

Mane, Inc.  
Teresa Harmeyer  
999 Tech Drive  
Milford, OH 45150

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2200** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

HCDES

OH-KY-IN Reg Council of Govs

KY

IN

**CLERMONT COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05875 FOR AN AIR CONTAMINANT SOURCE FOR  
Mane, Inc.**

On 10/24/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Mane, Inc.**, located at **999 Tech Drive, Milford, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05875:

**Synthetic Minor PTI for four process mixing tanks.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy,  
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 14-05875**

Application Number: 14-05875  
Facility ID: 1413080481  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Mane, Inc.  
Person to Contact: Teresa Harmeyer  
Address: 999 Tech Drive  
Milford, OH 45150

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**999 Tech Drive  
Milford, Ohio**

Description of proposed emissions unit(s):  
**Synthetic Minor PTI for four process mixing tanks.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Mane, Inc.

Facility ID: 1413080481

PTI Application: 14-05875

Issued: To be entered upon final issuance

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.)

**3. 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.

**4. 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,

**Mane, Inc.**

**Facility ID: 1413080481**

**PTI Application: 14-05875**

**Issued: To be entered upon final issuance**

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.

**5. 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).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

**Mane, Inc.**

**Facility ID: 1413080481**

**PTI Application: 14-05875**

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Mane, Inc.

Facility ID: 1413080481

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

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

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	20.0

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

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

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

**Operations, Property, and/or Equipment - (P001) - 1600 gallon process mixing tank**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic Compound (OC) emissions from the process mixing tank shall not exceed 7.75 lbs/hr.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) Synthetic minor to avoid nonattainment new source review permitting requirements	See terms and conditions A.2.a. and B.1.

**2. Additional Terms and Conditions**

- 2.a The combined annual OC emissions from the process mixing vessels (OEPA emissions units P001, P002, P003 and P004) at Mane, Inc. shall not exceed 20.0 tons per year based on a rolling, 12-month summation.
- 2.b The hourly emission limitation outlined in term A.1. is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the production and emission limitations.

**B. Operational Restrictions**

1. The maximum combined annual production rate for emissions units P001, P002, P003 and P004 shall not exceed 2000 tons per year, based upon a rolling, 12-month

Emissions Unit ID: **P001**

summation of the production rates. These emission units has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003 and P004:
  - a. the total production rate for each month;
  - b. the rolling, 12-month summation of the monthly combined production rates;
  - c. the total OC emission rate for each month; and
  - d. the rolling, 12-month summation of the monthly OC emission rates.
  
2. The permit to install for emissions units P001, P002, P003 and P004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):  
  
Pollutant: Ethyl Alcohol  
TLV (mg/m<sup>3</sup>): 1,884  
Maximum Hourly Emission Rate (lbs/hr): 33.27  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 15,340  
MAGLC (ug/m<sup>3</sup>): 44,863
  
3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make

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the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation of the production rate. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
2. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for emission units P001, P002, P003 and P004. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
3. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
7.75 lb/hr OC  
  
Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by multiplying the maximum hourly production rate (775 pounds/hr) by the emission factor of 1%.
  - b. Emission Limitation:  
20.0 TPY of OC for emissions units P001, P002, P003 and P004 combined as a rolling 12-month summation  
  
Applicable Compliance Method:  
Compliance with the emission limitation shall be determined by multiplying the rolling 12-month summation of actual production rates by the emission factor of

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1%.

2. Compliance with the production limitation in Section B.1 of these terms and conditions shall be determined by the record keeping required in Section C.1.

**F. Miscellaneous Requirements**

1. If probable cause exist indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1, D and E.

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

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

**Operations, Property, and/or Equipment - (P002) - 1163 gallon process mixing tank**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic Compound (OC) emissions from the process mixing tank shall not exceed 5.63 lbs/hr.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) Synthetic minor to avoid PSD requirements	See terms and conditions A.2.a. and B.1.

**2. Additional Terms and Conditions**

- 2.a The combined annual OC emissions from the process mixing vessels (OEPA emissions units P001, P002, P003 and P004) at Mane, Inc. shall not exceed 20.0 tons per year based on a rolling, 12-month summation.
- 2.b The hourly emission limitation outlined in term A.1. is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the production and emission limitations.

**B. Operational Restrictions**

1. The maximum combined annual production rate for emissions units P001, P002, P003 and P004 shall not exceed 2000 tons per year, based upon a rolling, 12-month summation of the production rates. These emission units has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

**Issued: To be entered upon final issuance**

Emissions Unit ID: **P002**

**Issued: To be entered upon final issuance**

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

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003 and P004:
  - a. the total production rate for each month;
  - b. the rolling, 12-month summation of the monthly combined production rates;
  - c. the total OC emission rate for each month; and
  - d. the rolling, 12-month summation of the monthly OC emission rates.
2. The permit to install for emissions units P001, P002, P003 and P004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethyl Alcohol

TLV (mg/m<sup>3</sup>): 1,884

Maximum Hourly Emission Rate (lbs/hr): 33.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 15,340

MAGLC (ug/m<sup>3</sup>): 44,863

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

Emissions Unit ID: **P002**

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

1. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports that identify all exceedances of the

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rolling, 12-month limitation of the production rate. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

2. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for emission units P001, P002, P003 and P004. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
3. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
5.63 lb/hr OC  
  
Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by multiplying the maximum hourly production rate (775 pounds/hr) by the emission factor of 1%.
  - b. Emission Limitation:  
20.0 TPY of OC for emissions units P001, P002, P003 and P004 combined as a rolling 12-month summation  
  
Applicable Compliance Method:  
Compliance with the emission limitation shall be determined by multiplying the rolling 12-month summation of actual production rates by the emission factor of 1%.
2. Compliance with the production limitation in Section B.1 of these terms and conditions

**Mane, Inc.**

DTI Application: 14 0597E

**Facility ID: 1413080481**Emissions Unit ID: **P002**

shall be determined by the record keeping required in Section C.1.

**F. Miscellaneous Requirements**

1. If probable cause exist indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1, D and E.

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

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

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

**Operations, Property, and/or Equipment - (P003) - 1686 gallon process mixing tank**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic Compound (OC) emissions from the process mixing tank shall not exceed 8.16 lbs/hr.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) Synthetic minor to avoid PSD requirements	See terms and conditions A.2.a. and B.1.

**2. Additional Terms and Conditions**

- 2.a The combined annual OC emissions from the process mixing vessels (OEPA emissions units P001, P002, P003 and P004) at Mane, Inc. shall not exceed 20.0 tons per year based on a rolling, 12-month summation.
- 2.b The hourly emission limitation outlined in term A.1. is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the production and emission limitations.

**B. Operational Restrictions**

1. The maximum combined annual production rate for emissions units P001, P002, P003 and P004 shall not exceed 2000 tons per year, based upon a rolling, 12-month summation of the production rates. These emission units has been in operation for more than 12 months and, as such, the permittee has existing records to generate the

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rolling, 12-month summation of the production rate, upon issuance of this permit.

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

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003 and P004:
  - a. the total production rate for each month;
  - b. the rolling, 12-month summation of the monthly combined production rates;
  - c. the total OC emission rate for each month; and
  - d. the rolling, 12-month summation of the monthly OC emission rates.

2. The permit to install for emissions units P001, P002, P003 and P004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethyl Alcohol

TLV (mg/m3): 1,884

Maximum Hourly Emission Rate (lbs/hr): 33.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 15,340

MAGLC (ug/m3): 44,863

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

1. The permittee shall submit to the Hamilton County Department of Environmental

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Services quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation of the production rate. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

2. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for emission units P001, P002, P003 and P004. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
3. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
8.16 lb/hr OC  
  
Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by multiplying the maximum hourly production rate (775 pounds/hr) by the emission factor of 1%.
  - b. Emission Limitation:  
20.0 TPY of OC for emissions units P001, P002, P003 and P004 combined as a rolling 12-month summation  
  
Applicable Compliance Method:  
Compliance with the emission limitation shall be determined by multiplying the rolling 12-month summation of actual production rates by the emission factor of 1%.
2. Compliance with the production limitation in Section B.1 of these terms and conditions

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shall be determined by the record keeping required in Section C.1.

**F. Miscellaneous Requirements**

1. If probable cause exist indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1, D and E.

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

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

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

**Operations, Property, and/or Equipment - (P004) - 2422 gallon process mixing tank**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic Compound (OC) emissions from the process mixing tank shall not exceed 11.73 lbs/hr.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) Synthetic minor to avoid PSD requirements	See terms and conditions A.2.a. and B.1.

**2. Additional Terms and Conditions**

- 2.a The combined annual OC emissions from the process mixing vessels (OEPA emissions units P001, P002, P003 and P004) at Mane, Inc. shall not exceed 20.0 tons per year based on a rolling, 12-month summation.
- 2.b The hourly emission limitation outlined in term A.1. is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the production and emission limitations.

**B. Operational Restrictions**

1. The maximum combined annual production rate for emissions units P001, P002, P003 and P004 shall not exceed 2000 tons per year, based upon a rolling, 12-month summation of the production rates. These emission units has been in operation for more than 12 months and, as such, the permittee has existing records to generate the

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rolling, 12-month summation of the production rate, upon issuance of this permit.

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

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003 and P004:
  - a. the total production rate for each month;
  - b. the rolling, 12-month summation of the monthly combined production rates;
  - c. the total OC emission rate for each month; and
  - d. the rolling, 12-month summation of the monthly OC emission rates.

2. The permit to install for emissions units P001, P002, P003 and P004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethyl Alcohol  
TLV (mg/m3): 1,884  
Maximum Hourly Emission Rate (lbs/hr): 33.27  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 15,340  
MAGLC (ug/m3): 44,863

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

1. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports that identify all exceedances of the

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rolling, 12-month limitation of the production rate. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

2. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for emission units P001, P002, P003 and P004. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
3. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
11.73 lb/hr OC  
  
Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by multiplying the maximum hourly production rate (775 pounds/hr) by the emission factor of 1%.
  - b. Emission Limitation:  
20.0 TPY of OC for emissions units P001, P002, P003 and P004 combined as a rolling 12-month summation  
  
Applicable Compliance Method:  
Compliance with the emission limitation shall be determined by multiplying the rolling 12-month summation of actual production rates by the emission factor of 1%.
2. Compliance with the production limitation in Section B.1 of these terms and conditions

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shall be determined by the record keeping required in Section C.1.

**F. Miscellaneous Requirements**

1. If probable cause exist indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1, D and E.