



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 14-04593

DATE: 9/18/2001

Bayer Corp
Terry Harris
367 Three Rivers Pkwy
Addyston, OH 45001

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 300** 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.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

HCDES

Ohio-Kentucky-Indiana Reg Coun of Govs

KY

IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

DRAFT MODIFICATION OF PERMIT TO INSTALL 14-04593

Application Number: 14-04593
APS Premise Number: 1431010054
Permit Fee: **To be entered upon final issuance**
Name of Facility: Bayer Corp
Person to Contact: Terry Harris
Address: 367 Three Rivers Pkwy
Addyston, OH 45001

Location of proposed air contaminant source(s) [emissions unit(s)]:

**356 Three Rivers Pkwy
Addyston, Ohio**

Description of proposed emissions unit(s):

Process unit for coagulating, washing and drying of intermediates - Modification.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Bayer Corp

Facility ID: 1431010054

PTI Application: 14-04593

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

Bayer Corp**Facility ID: 1431010054****PTI Application: 14-04593****Issued: To be entered upon final issuance**

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

6. General Requirements

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

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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10. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

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B. State Only Enforceable 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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. 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.

5. Termination of Permit To Install

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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.

6. 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 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.

7. 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.

8. Applicability

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

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9. 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.

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| PM | 7.05 |
| PM-10 | 7.05 |
| VOC | 36.13 |

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Bayer Corp

PTI Application: 14-04593

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Facility ID: 1431010054

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Bayer

PTI A

Emissions Unit ID: P036

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Bayer
PTI A

Emissions Unit ID: P036

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | OAC rule 3745-31-05(A)(3) |
|---|--------------------------------------|---------------------------|
|---|--------------------------------------|---------------------------|

| | | |
|--|---------------------------|--|
| P036 - process unit for coagulating, washing and drying of intermediates | OAC rule 3745-17-07(A)(1) | |
|--|---------------------------|--|

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)

OAC rule 3745-17-11

OAC rule 3745-21-07(G)

40 CFR, Part 63, Subpart JJJ

**Bayer
PTI A**

Emissions Unit ID: P036

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Applicable Emissions
Limitations/Control
Measures

8.25 lbs VOC/hr
197.98 lbs VOC/day
36.13 tons VOC/yr
1.61 lbs PM-PM10/hr
7.05 tons PM-PM10/yr

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B), 3745-21-07(G) and 40 CFR, Part 60, Subpart JJJ

Visible particulate emissions of fugitive dust shall not exceed twenty percent (20%) opacity, as a three minute average, except as specified by rule.

See terms A.I.2.2.b.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

8 lbs OC/hr, and 40 lbs OC/day, unless reduced by at least 85 percent, on any day when photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), are employed.

See terms A.I.2, A.II.4, A.III.4, A.IV.4 and A.VI.1.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The permittee shall comply with all applicable emission limitations and/or control requirements of 40 CFR Part 63, Subpart JJJ.
- 2.b** In order to minimize fugitive particulate emissions, only pellets shall be processed through the uncontrolled intermediate polymer silos.
- 2.c** Compliance with OAC rule 3745-31-05 shall be demonstrated by venting the OC emissions to a thermal oxidizer with at least a 95% control efficiency or a boiler having a 99.99% control efficiency and venting the particulate emissions from dryer outlet to a baghouse and scrubber.
- 2.d** The hourly emission limitations outlined above are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits

II. Operational Restrictions**1. Scrubber Operational Restrictions**

The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2 inches of water at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 390 gallons per minute at all times while the emissions unit is in operation.

2. Baghouse Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of 0.3 to 9 inches of water while the emissions unit is in operation.

3. Thermal Oxidizer Operational Restriction

The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1450 degrees fahrenheit.

4. The permittee shall comply with all applicable operational restrictions specified in 40 CFR, Part 63, Subpart JJJ.**5. Emissions vented to the boiler shall be introduced into the flame zone.**

III. Monitoring and/or Recordkeeping Requirements

1. Scrubber Monitoring and Recordkeeping Requirements

The permittee shall properly install, operate and maintain equipment to measure the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on a daily basis.
- b. The scrubber water flow rate, in gallons per minute, on a daily basis.
- c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2. Baghouse Pressure Drop Monitoring and Recordkeeping Requirements

The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

3. Thermal Oxidizer Temperature Monitoring and Recordkeeping Requirements

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 850 degrees fahrenheit.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall comply with all applicable monitoring and recordkeeping requirements

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specified in 40 CFR, Part 63, Subpart JJJ.

IV. Reporting Requirements1. Scrubber Reporting Requirements

The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

- a. The static pressure drop across the scrubber.
- b. The scrubber water flow rate.

2. Baghouse Pressure Drop Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.2.

3. Thermal Oxidizer Temperature Reporting Requirements

The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in term A.II.3.

4. The permittee shall comply with all applicable reporting requirements of 40 CFR, Part 63, Subpart JJJ.
5. The permittee shall submit a copy of the Notification of Compliance status to the Hamilton County Department of Environmental Services within 150 operating days after initial startup. The notification shall contain the information specified in §§63.1335(e)(5)(i)-(viii).
6. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emissions Unit ID: P036

- a. Emission Limitation:

20% opacity from stack
Applicable Compliance Method:
Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in Method 9 of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:

20% opacity for fugitive dust
Applicable Compliance Method:
Compliance with OAC rule 3745-17-07(B)(1) shall be determined using the methods outlined in Method 9 of 40 CFR Part 60, Appendix A.
 - c. Emission Limitation:
Mass emission limitations specified in Section A.I.1.

Applicable Compliance Method:

Compliance with the emission limitations outlined in Section A.I.1 shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI application 14-4593 submitted June 1, 1998.
 - d. Emission Limitation:

8 lbs OC/hr, 40 lbs OC/day
Applicable Compliance Method:
Compliance with the emission limitations outlined in Section A.I. shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI application 14-4593 submitted June 1, 1998.
2. Compliance with the control device operational restrictions in term A.II.1, A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in term A.III.1, A.III.2 and A.III.3.

VI. Miscellaneous Requirements

1. The permittee shall comply with all applicable miscellaneous requirements of 40 CFR, Part 63, Subpart JJJ.

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B. State Only Enforceable Section

I. 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.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| P036 - process unit for coagulating, washing and drying of intermediates | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 14-04593 Facility ID: 1431010054

FACILITY NAME Bayer Corp

FACILITY DESCRIPTION correction of dust collector pressure drop CITY/TWP Addyston
value - PTI 14-04593.

SIC CODE 2821 SCC CODE _____ EMISSIONS UNIT ID P036

EMISSIONS UNIT DESCRIPTION process unit for coagulating, washing and drying of intermediates

DATE INSTALLED _____

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | | | | | |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR 63,
subpartJJ

NESHAP?

PSD?

OFFSET POLICY?

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

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? _____

\$ _____

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____

YES _____

NO _____

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 14-04593 Facility ID: 1431010054

FACILITY NAME Bayer Corp

FACILITY DESCRIPTION correction of dust collector pressure drop value - PTI 14-04593. CITY/TWP Addyston

ADMINISTRATIVE MODIFICATION
inter-office communication

to: DAPC, Air Quality Modeling and Planning

from: HCDOES

subject: Administrative Modification of Permit to Install

date: 07/31/01

Choose one:

Initiated by: Permittee DO/LAA This modification is the result of an appeal to the Environmental Review Appeals Commission.

Please fill out the following:

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| PM | 7.05 |
| PM-10 | 7.05 |
| VOC | 36.13 |

Please provide a fairly detailed description of the basis for the modification and how the permit is being modified:

The terms and conditions of PTI 14-04593 are being modified to change the operational restrictions for the baghouse. The company has requested the pressure drop range be changed to 0.3 - 9.0 inches of water from 2 - 9 inches of water. The reason for the change is the air flow is not as high at times since they do not always run at maximum production.

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The permit fee should be 1/2 the normal fee. The fee is \$300.

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

| | <u>Electro nic</u> | <u>Additional information File Name Convention (your PTI # plus this letter)</u> | <u>Har d Co py</u> | <u>No ne</u> |
|---|--------------------------|--|--------------------------------|--------------------------|
| <u>Calculations (required)</u> | <input type="checkbox"/> | 0000000c.wpd | <input type="checkbox"/> | |
| <u>Modeling form/results</u> | <input type="checkbox"/> | 0000000s.wpd | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>PTI Application (complete or partial)*</u> | <input type="checkbox"/> | 0000000a.wpd | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>BAT Study</u> | <input type="checkbox"/> | 0000000b.wpd | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>Other/misc.</u> | <input type="checkbox"/> | 0000000t.wpd | <input type="checkbox"/> | <input type="checkbox"/> |

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04593

Facility ID: 1431010054

FACILITY NAME Bayer Corp

| | | | |
|----------------------|--|----------|----------|
| FACILITY DESCRIPTION | correction of dust collector pressure drop value - PTI 14-04593. | CITY/TWP | Addyston |
|----------------------|--|----------|----------|

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

- Synthetic Minor Determination and/or** **Netting Determination**
 Permit To Install **ENTER PTI NUMBER HERE**

A. Source DescriptionB. Facility Emissions and Attainment StatusC. Source EmissionsD. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant**Tons Per Year**

PM

7.05

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PTI Number: 14-04593

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FACILITY DESCRIPTION correction of dust collector pressure drop
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PM-10

7.05

VOC

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