



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL  
HAMILTON COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**Application No: 14-05462**

**DATE: 10/30/2003**

Bayer Polymers  
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 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 **\$750** 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,

*Michael W. Ahern*

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

CC: USEPA

HCDES

OH-KY-IN Regional Council of Governments

KY

IN

**HAMILTON COUNTY**

PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05462** FOR AN AIR CONTAMINANT SOURCE FOR  
**BAYER POLYMERS**

On 10/30/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Bayer Polymers**, located at **356 Three Rivers Pkwy, Addyston, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05462:

**coagulation, washing and drying of polymer intermediates.**

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 Howart 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 14-05462**

Application Number: 14-05462  
APS Premise Number: 1431010054  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Bayer Polymers  
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):  
**coagulation, washing and drying of polymer intermediates.**

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

Bayer Polymers

Facility ID: 1431010054

PTI Application: 14-05462

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.9 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**

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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.

## **10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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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 ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

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

#### **12. Air Pollution Nuisance**

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

**Bayer Polymers**

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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**

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. 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.

**Bayer Polymers****Facility ID: 1431010054****PTI Application: 14-05462****Issued: To be entered upon final issuance****5. 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.

**6. Public Disclosure**

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

**7. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate 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.

**8. 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.

**9. Additional Reporting Requirements When There Are No Deviations of Federally**

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**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>
PE/PM-10	9.5
OC	16.0

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**Issued**

**Facility ID: 1431010054**

Emissions Unit ID: P036

**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

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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.

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

40 CFR Part 63, Subpart JJJ

Continuous polymer drying operation for ABS(predominant product) and ASA with boilers and/or thermal oxidizer used to control organic compound emissions and a scrubber and baghouse used to control particulate emissions.

OAC rule 3745-31-05(A)(3)

Existing Group 1 and Group 2 continuous process vents

Emissions vented to boiler or thermal oxidizer are non-halogenated

**Bayer  
PTI A**

Emissions Unit ID: P036

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	Applicable Emissions <u>Limitations/Control Measures</u>	
OAC rule 3745-17-07(A)	3.65 lbs organic compound (OC)/hr* 16.0 tons OC/yr*	from Synthetic Organic Chemical Manufacturing Industry, with the differences noted in paragraphs (a)(1) through (a)(18) of 40 CFR 63.1315.  See A.I.2.a-A.I.2.b.
OAC rule 3745-17-07(B)	0.67 lb particulate emissions (PE)/hr from all stacks associated with this emissions unit* 2.93 tons PE/yr from all stacks associated with this emissions unit*	Heat Exchange Provisions: [40 CFR 63.1328]  Start Up, Shutdown, Malfunction Plan (SSM):
OAC rule 3745-17-08(B)	1.50 lbs fugitive PE/hr* 6.57 tons fugitive PE/yr*  PE = PM10	[40 CFR 63.6.(e)(3)(i)]  Process Wastewater Provisions:
OAC rule 3745-17-11(B)	*The lbs/hr and TPY emission limitations for OC, PE and PM10 are based on the emissions unit potential to emit. Therefore no recordkeeping or reporting requirements are necessary to demonstrate compliance.	[40 CFR Part 63.1330]  Leak Detection and Repair Provisions: [40 CFR Part 63.1331]
OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), 3745-17-07(B), 3745-17-08(B) and 40 CFR Part 63, Subpart JJJ.  See A.I.2.d. through A.I.2.f.  As specified in 40 CFR 63.1315(a) the permittee shall comply with the requirements of 40 CFR 63.113 through 40 CFR 63.118 of Subpart G, National Emission Standards for Organic Hazardous Air Pollutants	Visible particulate emissions (PE) from any stack shall not exceed 20% percent opacity, as a six-minute average, except as specified by rule.  Fugitive visible particulate emissions (PE) shall not exceed 20% percent opacity, as a three-minute average, except as specified by rule.  The permittee shall employ Reasonable Available Control Measures (RACM) in order to minimize or eliminate fugitive dust. RACM for this emissions unit is the processing of only pellets through the uncontrolled intermediate polymer silos.  The emission limitation specified by this

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

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

## **2. Additional Terms and Conditions**

- 2.a** The permittee shall reduce emissions of total organic hazardous air pollutants by 98 weight-percent or to a concentration of 20 parts per million by volume, whichever is less stringent. For combustion devices, the emission reduction or concentration shall be calculated on a dry basis, corrected to 3-percent oxygen, and compliance can be determined by measuring either organic hazardous air pollutants or total organic carbon using the procedures in 40 CFR 63.116.

[40 CFR 63.113(a)(2)]

- 2.b** The vent stream shall be introduced into the flame zone of the boilers used to comply with the emission reductions listed in A.I.2.a.

[40 CFR 63.113(b)]

- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by venting the OC emissions to a thermal oxidizer with at least a 98% control efficiency or to a boiler having a 98% control efficiency and venting particulate emissions from dryer outlet to a baghouse and scrubber.

- 2.d** Only pellets shall be processed through the uncontrolled intermediate polymer silos.

- 2.e** The particulate emissions from Dryer #1 shall be vented to scrubber P36SCRB.

- 2.f** The particulate emissions from Dryer #2 shall be vented to baghouse P36FBD.

## **II. Operational Restrictions**

1. The average daily firebox temperature for boiler B002 shall not be below 790 degrees F. This daily average was established during the most recent stack test that demonstrated this emission unit to be in compliance.

The average daily firebox temperature shall be based on the most recent stack test that

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demonstrated this emissions unit to be in compliance. Future parameter monitoring levels (firebox temperature) for continuous vent streams shall be established as specified in 40 CFR 63.1334(b)(2).

[40 CFR 63.1334(a)]

2. The average daily firebox temperature for boiler B006 shall not be below 1238 degrees F. This daily average was established during the most recent stack test that demonstrated this emissions unit to be in compliance.

The average daily firebox temperature shall be based on the most recent stack test that demonstrated this emissions unit to be in compliance. Future parameter monitoring levels (firebox temperature) for continuous vent streams shall be established as specified in 40 CFR 63.1334(b)(2).

[40 CFR 63.1334(a)]

3. The average daily firebox temperature of the thermal oxidizer shall not be below 1498 degrees F. This daily average was established during the most recent stack test that demonstrated this emissions unit to be in compliance.

The average daily firebox temperature shall be based on the most recent stack test that demonstrated this emissions unit to be in compliance. Future parameter monitoring levels (firebox temperature) for continuous vent streams shall be established as specified in 40 CFR 63.1334(b)(2).

[40 CFR 63.1334(a)]

4. The pressure drop across scrubber P36SCB 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 for scrubber P36SCB 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.

5. The pressure drop across baghouse P36FBD shall be maintained within the range of 0.3 - 9 inches of water while the emissions unit is in operation.

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

1. When any boiler (currently B002 or B006) is being used to incinerate the organic compound emissions from emissions unit P036, and the boiler is less than 44 megawatts design heat input

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Emissions Unit ID: P036

capacity is used, and all batch process vents are not introduced with the primary fuel or are used as the primary fuel, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the average daily combustion temperature within the boiler firebox for each boiler being used that day. For computation of the daily average, the beginning of the operating day shall commence at 0000 hours and conclude at 2400 hours.

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.

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This monitoring equipment shall be in operation at all times when batch emission episodes, or portions thereof, that the owner or operator has selected to control are vented to the control device, or at all times when an aggregate batch vent stream is vented to the control device

[40 CFR 63.114(a)(3)]

2. The permittee shall comply with paragraph A.III.2.a or A.III.2.b for any bypass line between the origin of the gas stream [i.e., at an air oxidation reactor, distillation unit, or reactor as identified in 40 CFR 63.107(b)] and the point where the gas stream reaches the process vent, as described in 40 CFR 63.107, that could divert the gas stream directly to the atmosphere. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to A.III.2.a or A.III.2.b.
  - a. The permittee shall properly install, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. Records shall be generated as specified in 40 CFR 63.118(a)(3). The flow indicator shall be installed at the entrance to any bypass line that could divert the gas stream to the atmosphere; or
  - b. Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the non-diverting position and the gas stream is not diverted through the bypass line.

[40 CFR 63.114(d)]

3. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across scrubber P36SCRB 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.

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4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across baghouse P36FBD 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.
  
5. The permittee shall properly install, operate and maintain a temperature monitoring device equipped with a continuous recorder for the thermal oxidizer. The temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs. For computation of the daily average, the beginning of the operating day shall commence at 0000 hours and conclude at 2400 hours.

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.

[40 CFR 63.114(a)(1)]

**IV. Reporting Requirements**

1. The permittee shall submit Subpart JJJ Periodic reports to the Hamilton County Department of Environmental Services in accordance with 40CFR 63.1335(e)(6). These reports shall cover the semiannual periods from November 16th - May 15th and May 16th - November 15th of each year and be submitted by July 15th and January 15th, respectively. The periodic reports shall contain the information specified in 40 CFR 63.1335(e)(6). This report shall include the following Main Duct Boiler and Thermal Oxidizer reporting requirements:
  - i. All dates and times in which a Main Duct Boiler or the Thermal Oxidizer daily average firebox temperature was less than the temperature required in A.II.
  - ii. All dates and times in which a Boiler or the Thermal Oxidizer temperature monitoring device was not operational while treating emissions unit's P036 emissions.
  - iii. All dates and times in which emissions unit's P036 emissions were diverted from the Boilers or Thermal Oxidizer to the atmosphere.
  - iv. All dates and times in which a Main Duct Boiler or the Thermal Oxidizer bypass line monitoring systems required by Sections A.III.2 of this permit were not operational while treating emissions unit P036 emissions or seal/closure mechanisms required by Section A.III.2 were found unlocked during a monthly inspection.

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2. The permittee shall submit semi-annual deviation (excursion) reports that identify all periods of time during which the pressure drop and/or scrubber water flow rate for the scrubber was not maintained at or above the required levels.

These reports shall be submitted to the Hamilton County Department of Environmental Services. These reports shall cover the semiannual periods from November 16th - May 15th and May 16th - November 15th of each year and be submitted by July 15th and January 15th, respectively

3. The permittee shall submit semi-annual deviation (excursion) reports that identify all periods of time during which the pressure drop for the baghouse was not maintained at or above the required levels.

These reports shall be submitted to the Hamilton County Department of Environmental Services. These reports shall cover the semiannual periods from November 16th - May 15th and May 16th - November 15th of each year and be submitted by July 15th and January 15th, respectively

## **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):

Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. The initial compliance test required under 40 CFR 63.116(3) for the boilers was conducted on 9/13/01. The results of this test showed outlet concentrations of 3.7 ppm OC for B002 and 2.5 ppm OC for B006. This test indicated compliance with the 20 ppm OC limit specified in A.I.2.a.

The initial compliance test required under 40 CFR 63.116(3) for the thermal oxidizer was conducted on 9/12/01. The results of this test showed a control efficiency of 99.1%. This test indicated compliance with 98% control efficiency requirement specified in A.I.2.a

3. 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):

Emission Limitation:

0.67 lb particulate emissions (PE)/hr and 2.93 tons PE/yr from all stacks associated with this

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emissions unit

## Applicable Compliance Method:

The particulate emission limitations were established based on engineering calculations and production information contained in PTI 14-05462. This production information is confidential. Therefore, no detailed emission calculations can be provided.

Should testing be required to demonstrate compliance with the PE emission limitations, Methods 1-5 of 40 CFR Part 60, Appendix A shall be used.

4. 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):

## Emission Limitation:

1.50 lbs particulate emissions (PE)/hr and 6.57 tons PE/yr from all fugitive emission points associated with this emissions unit

## Applicable Compliance Method:

The particulate emission limitations were established based on engineering calculations and production information contained in PTI 14-05462. This production information is confidential. Therefore, no detailed emission calculations can be provided.

5. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20% opacity as a three-minute average except as specified by rule.

## Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

6. Emission Limitations:

3.65 lbs organic compound (OC)/hr and 16.0 tons OC/yr

## Compliance Method:

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**Issued**

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The lbs/hr and TPY emission limitations were based on the emission units potential to emit. As long as the permittee is in compliance with the control efficiency requirements specified A.I.1, compliance with the lbs/hr and TPY emission limitations is ensured.

**VI. Miscellaneous Requirements**

none

**Bayer  
PTI A**

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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>
Continuous polymer drying operation for ABS(predominant product) and ASA with boilers and/or thermal oxidizer used to control organic compound emissions and a scrubber and baghouse used to control particulate emissions.		
Existing Group 1 and Group 2 continuous process vents		
Emissions vented to boiler or thermal oxidizer are non-halogenated		

**2. Additional Terms and Conditions**

**2.a** none

**II. Operational Restrictions**

none

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

none

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**Bayer  
PTI A**

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**IV. Reporting Requirements**

none

**V. Testing Requirements**

none

**VI. Miscellaneous Requirements**

none