



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: 14-04881

DATE: 2/24/00

Henkel Corporation
Kris Singleton
4900 Este Avenue
Cincinnati, OH 45232-1491

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 **\$400** 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
Kentucky

HCDES
Indiana

OH-KY-IN Reg Coun of Govt



**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 14-04881

Application Number: 14-04881
APS Premise Number: 1431070035
Permit Fee: **To be entered upon final issuance**
Name of Facility: Henkel Corporation
Person to Contact: Kris Singleton
Address: 4900 Este Avenue
Cincinnati, OH 45232-1491

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4900 Este Avenue
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Two 96.72 MMBtu/hour natural gas fired boilers.

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

Henkel Corporation

Facility ID: 1431070035

PTI Application: 14-04881

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.11 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.

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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 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.

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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 are inadequate 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 prove to be inadequate 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).

9. Best Available Technology

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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.

10. 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.

11. 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>
OC	4.3
PM	2.96
SO ₂	0.24
NO _x	39.0
CO	32.8
PM ₁₀	2.96

Henkel Corporation

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Facility ID: 1431070035

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Henke

PTI A

Emissions Unit ID: B036

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.

Henke
PTI A

Emissions Unit ID: B036

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>	<u>Applicable Emissions Limitations/Control Measures</u>
B036 - Temporary natural gas-fired boiler with low NO _x burner - Temporary Boiler #1	OAC rule 3745-31-05(D)	19.5 TPY NO _x *, see term A.II.2
	OAC rule 3745-15-07	See General Terms.
	OAC rule 3745-17-07(A)(1)	See term A.I.2.a.
	OAC rule 3745-17-10(B)(1)	0.020 lb/MMBTU PM
	OAC rule 3745-23-06	The emission limitations established by this rules is less stringent than those established by OAC rule 3745-31-05(D).
	40 CFR Part 60, Subpart Dc**	See term A.III.1 and A.IV.1. *The emission limit is based on a rolling, 12-month summation.

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the

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Henke

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: B036

United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

Henke

PTI A

Emissions Unit ID: B036

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. Emissions units B036 and B037 shall utilize only natural gas as fuel.
2. The maximum annual natural gas usage rate for this emissions unit shall not exceed 390 million cubic feet per year, based upon a rolling, 12-month summation of the natural gas usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum natural gas usage levels specified in the following table:

<u>Month</u>	<u>Cubic Feet)</u>	Maximum Allowable Cumulative Natural Gas Usage (Million
1	195.0	n
1-2	195.0	
1-3	195.0	
1-4	195.0	
1-5	195.0	
1-6	195.0	
1-7	227.5	
1-8	260.0	
1-9	292.5	

Henke**PTI A**

Emissions Unit ID: B036

Issued: To be entered upon final issuance

1-10	325.0
1-11	357.5
1-12	390.0

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage rate limitation shall be based upon a rolling, 12-month summation of the natural gas usage rate.

Henke**PTI A**

Emissions Unit ID: B036

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall record and maintain records of the amounts of fuel combusted during each day and each calendar month. The updated rolling, 12-month summation shall include the information for the current month and the preceding eleven months. For the first twelve calendar months of operation following the issuance of this permit, this shall be a cumulative total of all months since the issuance of this permit to install.

IV. Reporting Requirements

1. Pursuant to the NSPS, the permittee is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and
 - d. The design heat input capacity of each emissions unit and the identification of the fuel to be combusted in each emissions unit (no later than 30 days after the construction date).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 1049
Columbus, Ohio 43216-1049

and

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance (deviation) of the emission limitations and/or natural gas usage limitations set forth in this permit. The permittee shall submit reports which identify all exceedances of these limitations, as well as corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

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Emissions Unit ID: B036

3. The permittee shall submit annual reports which specify the total NO_x emissions from these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the allowable annual emission rate for NO_x specified in this permit shall be demonstrated by multiplying the appropriate emission factors from AP42 section 1.4 (dated 7/98) times the annual natural gas usage rate.
2. Compliance with the opacity limitation stated in term A.I.2.a. shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
3. Compliance with the natural gas usage limitation specified in term A.II.2. shall be demonstrated by the record keeping requirements specified in A.III.1.

VI. Miscellaneous Requirements

None

Henke
PTI A

Emissions Unit ID: B036

Issued: To be entered upon final issuance

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>
B036 - Temporary natural gas-fired boiler with low NOx burner - Temporary Boiler #1	OAC rule 3745-31-05(A)(3)	0.10 lb/MMBTU NO _x 0.0006 lb/MMBTU SO ₂ , 0.12 TPY SO ₂ 0.084 lb/MMBTU CO, 16.4 TPY CO 0.011 lb/MMBTU OC, 2.15 TPY OC 0.0076 lb/MMBTU PM*, 1.48 TPY PM*

*Assume all PM is PM₁₀.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of low NOx burners, emission limitations and the natural gas usage limitations.

II. Operational Restrictions

See term A.II.2.

III. Monitoring and/or Recordkeeping Requirements

See term A.III.1.

IV. Reporting Requirements

See term A.IV.2.

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Henke

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: B036

Henke

PTI A

Emissions Unit ID: B036

Issued: To be entered upon final issuance

V. Testing Requirements

1. Compliance with the allowable lb/MMBTU emission rates specified in this permit shall be demonstrated by multiplying the appropriate emission factors from AP42 section 1.4 (dated 7/98) times the hourly natural gas usage rate and then dividing by the heat input capacity of the boiler.

VI. Miscellaneous Requirements

1. This permit to install will expire on October 31, 2000.

Henke
PTI A

Emissions Unit ID: B037

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>	<u>Applicable Emissions Limitations/Control Measures</u>
B037 - Temporary natural gas-fired boiler with low NOx burner - Temporary Boiler #2	OAC rule 3745-31-05(D)	19.5 TPY, NOx, see term A.II.2.
	OAC rule 3745-15-07	See General Terms.
	OAC rule 3745-17-07(A)(1)	See Additional Term and Condition A.I.2.a.
	OAC rule 3745-17-10(B)(1)	0.020 lb/MMBTU PM
	OAC rule 3745-23-06**	**The emission limitations established by this rule is less stringent than those established by OAC rule 3745-31-05(D).
	40 CFR Part 60, Subpart Dc**	See Special Term and Condition A.II.1 and A.IV. 1. *The emission limit is based on a rolling, 12-month summation.

2. Additional Terms and Conditions

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

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Emissions Unit ID: B037

- 2.b** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. Emissions units B036 and B037 shall utilize only natural gas as fuel.
2. The maximum annual natural gas usage for this emissions unit shall not exceed 390 million cubic feet per year, based upon a rolling, 12-month summation of the natural gas usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum natural gas usage levels specified in the following table:

<u>Month</u>	<u>Cubic Feet</u>	Maximum Allowable Cumulative Natural Gas Usage (Million)
1	195.0	
1-2	195.0	
1-3	195.0	
1-4	195.0	
1-5	195.0	
1-6	195.0	
1-7	227.5	
1-8	260.0	
1-9	292.5	

Henke

PTI A

Emissions Unit ID: B037

Issued: To be entered upon final issuance

1-10	325.0
1-11	357.5
1-12	390.0

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage rate limitation shall be based upon a rolling, 12-month summation of the natural gas usage rate.

Henke**PTI A**

Emissions Unit ID: B037

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall record and maintain records of the amounts of fuel combusted during each day and each calendar month. The updated rolling, 12-month summation shall include the information for the current month and the preceding eleven months. For the first twelve calendar months of operation following the issuance of this permit, this shall be a cumulative total of all months since the issuance of this permit to install.

IV. Reporting Requirements

1. Pursuant to the NSPS, the permittee is hereby advised of the requirement to report the following at the appropriate times:

- a. Construction date (no later than 30 days after such date);
- b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. Actual start-up date (within 15 days after such date); and
- d. The design heat input capacity of each emissions unit and the identification of the fuel to be combusted in each emissions unit (no later than 30 days after the construction date).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 1049
Columbus, Ohio 43216-1049

and

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance (deviation) of the emission limitations and/or natural gas usage limitations set forth in this permit. The permittee shall submit reports which identify all exceedances of these limitations, as well as corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

3. The permittee shall submit annual reports which specify the total NO_x emissions from these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the allowable annual emission rate for NO_x specified in this permit shall be demonstrated by multiplying the appropriate emission factors from AP42 section 1.4 (dated 7/98) times the annual natural gas usage rate.
2. Compliance with the opacity limitation stated in term A.I.2.a. shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
3. Compliance with the natural gas usage limitation specified in term A.II.2. shall be demonstrated by the record keeping requirements specified in term A.III.1.

VI. Miscellaneous Requirements

None

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>
B037 - Temporary natural gas-fired boiler with low NOx burner - Temporary Boiler #2	OAC rule 3745-31-05(A)(3)	0.10 lb/MMBTU NO _x 0.0006 lb/MMBTU SO ₂ , 0.12 TPY SO ₂ 0.084 lb/MMBTU CO, 16.4 TPY CO 0.011 lb/MMBTU OC, 2.15 TPY OC 0.0076 lb/MMBTU PM*, 1.48 TPY PM*
		*Assume all PM is PM ₁₀ .

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of low NOx burners, emission limitations and the natural gas usage limitations.

II. Operational Restrictions

See term A.II.2.

III. Monitoring and/or Recordkeeping Requirements

See term A.III.1.

IV. Reporting Requirements

See term A.IV.2.

Henke

PTI A

Emissions Unit ID: B037

Issued: To be entered upon final issuance

V. Testing Requirements

1. Compliance with the allowable lb/MMBTU emission rates specified in this permit shall be demonstrated by multiplying the appropriate emission factors from AP42 section 1.4 (dated 7/98) times the hourly natural gas usage rate and then dividing by the heat input capacity of the boiler.

VI. Miscellaneous Requirements

1. This permit to install will expire on October 31, 2000.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04881 Facility ID: 1431070035

FACILITY NAME Henkel Corporation

FACILITY DESCRIPTION Two 96.72 MMBTU/hour natural gas fired boilers CITY/TWP Cincinnati

SIC CODE 2899 SCC CODE 1-02-006-02 EMISSIONS UNIT ID B036

EMISSIONS UNIT DESCRIPTION Temporary natural gas-fired boiler with low NOx burner - Temporary Boiler #1

DATE INSTALLED May 2000

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	Attainment	0.0076 lb/MMBtu	---	0.0076 lb/MMBtu	1.48
PM ₁₀	Attainment	0.0076 lb/MMBtu	---	0.0076 lb/MMBtu	1.48
Sulfur Dioxide	Attainment	0.0006 lb/MMBtu	---	0.0006 lb/MMBtu	0.12
Organic Compounds	Nonattainment	0.011 lb/MMBtu	---	0.011 lb/MMBtu	2.15
Nitrogen Oxides	Attainment	0.10 lb/MMBtu	---	0.10 lb/MMBtu	19.5
Carbon Monoxide	Attainment	0.084 lb/MMBtu	---	0.084 lb/MMBtu	16.4
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Dc**

NESHAP?

PSD?

OFFSET POLICY?

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

Enter Determination BAT is the use of low NOx burners, emission limitations and the natural gas usage limitations.IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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 X NO

IDENTIFY THE AIR CONTAMINANTS: _____

3 NEW SOURCE REVIEW FORM B

PTI Number: 14-04881 Facility ID: 1431070035

FACILITY NAME Henkel Corporation

FACILITY DESCRIPTION Two 96.72 MMBTU/hour natural gas fired CITY/TWP Cincinnati

Emissions Unit ID: B037

SIC CODE 2899 SCC CODE 1-02-006-02 EMISSIONS UNIT ID B037

EMISSIONS UNIT DESCRIPTION Temporary natural gas-fired boiler with low NOx burner - Temporary Boiler #2

DATE INSTALLED May 2000

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	Attainment	0.0076 lb/MMBtu	---	0.0076 lb/MMBtu	1.48
PM ₁₀	Attainment	0.0076 lb/MMBtu	---	0.0076 lb/MMBtu	1.48
Sulfur Dioxide	Attainment	0.0006 lb/MMBtu	---	0.0006 lb/MMBtu	0.12
Organic Compounds	Nonattainment	0.011 lb/MMBtu	---	0.011 lb/MMBtu	2.15
Nitrogen Oxides	Attainment	0.10 lb/MMBtu	---	0.10 lb/MMBtu	19.5
Carbon Monoxide	Attainment	0.084 lb/MMBtu	---	0.084 lb/MMBtu	16.4
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Dc** NESHAP? PSD? OFFSET POLICY?

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

Enter Determination BAT is the use of low NOx burners, emission limitations and the natural gas usage limitations.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
 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 X NO

IDENTIFY THE AIR CONTAMINANTS: _____

32 NEW SOURCE REVIEW FORM B

PTI Number: 14-04881

Facility ID: 1431070035

FACILITY NAME Henkel Corporation

FACILITY DESCRIPTION Two 96.72 MMBTU/hour natural gas fired CITY/TWP Cincinnati

Emissions Unit ID: B037

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

NONE

Please provide any additional permit specific notes as you deem necessary:

Permit Review Narrative

Henkel Corporation
4900 Este Avenue
Cincinnati, Ohio 45232

This permit is for the installation of two temporary 96.72 MMBTU/Hr natural gas fired boilers. The boilers are temporary and will be used during the plant downtime for maintenance.

These emissions units are regulated by Ohio Administrative Code (OAC) rules 3745-31-05(BAT), 3745-15-07, 3745-17-07, 3745-17-10, 3745-23-06 and 40 CFR Part 60, Subpart Dc. BAT for these emissions units are the use of low NO_x burners and compliance with the specified allowable emission rates and operating limitations outlined in the terms and conditions of this permit. This permit is a synthetic minor; the combined annual fuel usage is limited, thus limiting the NO_x emissions to 39.0 TPY.

The emission calculations for these emissions units are based on the AP42 emission factors in section 1.4.

Actual = Allowable Emissions (2 Boilers)
SO₂:0.0006 lb/MMBTU, 0.24 TPY
NO_x:0.10 lb/MMBTU, 39.0 TPY
CO:0.084 lb/MMBTU, 32.8 TPY
PM:0.0076 lb/MMBTU, 2.96 TPY*
PM₁₀:0.0076 lb/MMBTU, 2.96 TPY
OC:0.011 lb/MMBTU, 4.3 TPY
*Assume that all PM is PM₁₀.

New source review modeling was not performed because there is no increase in heat input capacity with the addition of these emissions units. These boilers will be used while the existing boilers are not operating.

Approval is recommended for this permit. The emissions units are in compliance with the applicable rules.

Permit fee:The fee for one 96.72 MMBTU/hr boiler = \$400.
The fee = half since natural gas will be burned = \$200 x 2 boilers = \$400

Prepared by:Monica A. Friedl
Date prepared: January 24, 2000

Permit To Install Synthetic Minor Write-Up

PTI Num

FACILITY

FACILITY DESCRIPTION

Two 96.72 MMBTU/hour natural gas fired
boilers

CITY/TWP

Emissions Unit ID: B037

Cincinnati

A. Emissions Units Description

The Henkel Corporation proposes to install two temporary 96.72 MMBTU/Hr natural gas boilers (B036-B037). NO_x emissions will be controlled by low-NO_x burners and a limitation on natural gas usage.

B. Facility Emissions and Attainment Status

The Henkel Corporation is a major source for sulfur dioxide and nitrogen oxides, and minor for particulates, carbon monoxide and organic compounds. It is located in a primary non-attainment area for volatile organic compounds.

C. New Source Emissions

This permit will be made a synthetic minor by limiting the natural gas usage to 390 million cubic feet per year for each boiler. The increase in NO_x emissions will be limited to 39.0 tons per year.

Maximum Potential Uncontrolled Emissions (NO_x from each boiler)

$$\text{AP42 1.4 (dated 7/98)} = 100 \text{ lbs}/10^6 \text{ ft}^3 \times 0.09672 \text{ } 10^6 \text{ ft}^3/\text{hr} = 9.67 \text{ lbs/hr}$$

$$9.67 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ Ton}/2000 \text{ lbs} = 42.36 \text{ TPY}$$

D. Conclusion

The terms and conditions in the Permit to Install will limit emissions units B036 and B037 to a usage of 390 million cubic feet of gas per year each on a rolling, 12-month total. Daily records of the fuel usage along with quarterly reports will be required to assure compliance. The total increase in NO_x emissions will be less than the significant emission rate (40 tons per year) and, therefore, will not be subject to PSD review.

34 NEW SOURCE REVIEW FORM B

PTI Number: 14-04881

Facility ID: 1431070035

FACILITY NAME Henkel Corporation

FACILITY DESCRIPTION Two 96.72 MMBTU/hour natural gas fired CITY/TWP Cincinnati

Emissions Unit ID: B037

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	4.3
PM	2.96
SO ₂	0.24
NO _x	39.0
CO	32.8
PM ₁₀	2.96