

Facility ID: 0857042020 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit P001](#)
[Go to Part II for Emissions Unit P002](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0857042020 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Burlap treatment dip line No. 1	OAC rule 3745-31-05(A)(3) PTI 08-3818	0.51 lb/hour and 2.23 TPY ammonia

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The pH of the scrubber liquor shall be maintained within a range of 1.5 to 2.5.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 2 gallons per minute at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pH of the scrubber liquor 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.
2. The permittee shall collect and record the following information each day:
 - a. The pH of the scrubber liquor, on a once per shift basis.
 - b. The scrubber water flow rate, in gallons per minute, on a once per shift basis.
 - c. A log or record of the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber liquor pH and/or water flow rate did not comply with the limits specified above. These deviation (excursion) reports shall be submitted in writing to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) specified in Section A.1. above shall be determined in accordance with the following method(s):
 Emission Limitation -

0.51 lb/hour ammonia

Applicable Compliance Method -

Compliance with this mass emission limitation was demonstrated during a stack test conducted on March 30, 1999 showing results of 0.29 lb/hour. If required, compliance shall be based upon additional stack testing.

Emission Limitation -

2.23 TPY ammonia

Applicable Compliance Method -

The 2.23 TPY limitation was developed by multiplying the 0.51 lb/hour allowable emission rate by a maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ammonia

TLV (ug/m3): 17,000

Maximum hourly Emission Rate (lbs/hour): 1.02 lbs/hour (P001 and P002 share a common exhaust, therefore the maximum hourly emission rate is the sum of the hourly allowables for each unit.)

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3): 82.71

MAGLC (ug/m3): 170

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification".

- a. Changes in the composition of materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 0857042020 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

- (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Burlap treatment dip line No. 2	OAC rule 3745-31-05(A)(3) PTI 08-3818	0.51 lb/hour and 2.23 TPY ammonia

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

- 1. The pH of the scrubber liquor shall be maintained within a range of 1.5 to 2.5.
- 2. The scrubber water flow rate shall be continuously maintained at a value of not less than 2 gallons per minute at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to continuously monitor the pH of the scrubber liquor 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.
- 2. The permittee shall collect and record the following information each day:
 - a. The pH of the scrubber liquor, on a once per shift basis.
 - b. The scrubber water flow rate, in gallons per minute, on a once per shift basis.
 - c. A log or record of the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- 3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber liquor pH and/or water flow rate did not comply with the limits specified above. These deviation (excursion) reports shall be submitted in writing to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

E. Testing Requirements

- 1. Compliance with the emission limitation(s) specified in Section A.1. above shall be determined in accordance with the following method(s):
 - Emission Limitation - 0.51 lb/hour ammonia
 - Applicable Compliance Method - Compliance with this mass emission limitation was demonstrated during a stack test conducted on March 30, 1999 showing results of 0.29 lb/hour. If required, compliance shall be based upon additional stack testing.
 - Emission Limitation - 2.23 TPY ammonia
 - Applicable Compliance Method - The 2.23 TPY limitation was developed by multiplying the 0.51 lb/hour allowable emission rate by a maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

F. Miscellaneous Requirements

- 1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for

each pollutant:

Pollutant: ammonia

TLV (ug/m3): 17,000

Maximum hourly Emission Rate (lbs/hour): 1.02 lbs/hour (P001 and P002 share a common exhaust, therefore the maximum hourly emission rate is the sum of the hourly allowables for each unit.)

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3): 82.71

MAGLC (ug/m3): 170

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification".

- a. Changes in the composition of materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.