

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.

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

Facility ID: 0857042020 Emissions Unit ID: P002 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. 2	OAC rule 3745-31-05(A)(3) PTI 08-3818	The ammonia from this emissions unit shall not exceed 0.51 pound per hour (lb/hour) and 2.23 tons per year (TPY).

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 while this emission unit is in operation.
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 permit to install for this emissions unit (P001 and P002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia  
 TLV (mg/m3): 1,700  
 Maximum Hourly Emission Rate (lbs/hr): 1.02  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82.71  
 MAGLC (ug/m3): 170

4. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that

can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- 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 District Office or local air agency) within 45 days after the exceedance occurs.
  2. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.
- 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. None