



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
HAMILTON COUNTY
Application No: 14-05386**

CERTIFIED MAIL

DATE: 3/13/2003

Givaudan Flavors Corp
Eric Barnes
110 E 70th Street
Cincinnati, OH 45216

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,

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

CC: USEPA HCDES Ohio-Kentucky-Indiana Regional Council of Governments KY IN

HAMILTON COUNTY

PUBLIC NOTICE ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05386** FOR AN AIR CONTAMINANT SOURCE FOR **GIVAUDAN FLAVORS CORP**

On 3/13/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Givaudan Flavors Corp**, located at **110 E 70th Street, Cincinnati, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05386:

Spray Dryer 4 and 5.

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.

Harry Schweitering, Hamilton County Department of Environmental Services, 250 William Howard 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 14-05386

Application Number: 14-05386
APS Premise Number: 1431070914
Permit Fee: **To be entered upon final issuance**
Name of Facility: Givaudan Flavors Corp
Person to Contact: Eric Barnes
Address: 110 E 70th Street
Cincinnati, OH 45216

Location of proposed air contaminant source(s) [emissions unit(s)]:
**110 E 70th Street
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Spray Dryer 4 and 5.

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

Part I - GENERAL TERMS AND CONDITIONS

A. 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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

Issued: To be entered upon final issuance

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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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

Givaudan Flavors Corp

PTI Application: 14-05386

Issued: To be entered upon final issuance

lead to such sanctions

Facility ID: 1431070914

Issued: To be entered upon final issuance

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.

10. 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.

11. 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.

12. 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.

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

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

Issued: To be entered upon final issuance

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.

14. 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.

15. 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.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM10	2.0
OC	7.1

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P002 - Spray Dryer 4	OAC rule 3745-31-02(A)(2)	0.23 lb/hour PM/PM10 1.0 TPY PM/PM10 0.81 lb/hour OC 3.55 TPY OC
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- 2.a The hourly and annual emission limitations outlined in term A.1. are based upon the

Issued: To be entered upon final issuance

emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limits.

- 2.b** Compliance with OAC rule 3745-31-02(A)(2) shall be demonstrated by the use of a scrubber with at least a 97% control efficiency and a thermal oxidizer with at least a 97% control efficiency.

B. Operational Restrictions

1. The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 1.0 inch of water at all times while the emissions unit is in operation.
3. The scrubber water flow rate shall be maintained at a value of not less than 500 gallons per minute of recirculating water and 10 gallons per minute of fresh water at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

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

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

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

Emissions Unit ID: **P002**

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate for the recirculating and fresh water 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.

Issued: To be entered upon final issuance

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 for the recirculating and fresh water, 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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in term B.1.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels specified in terms B.2 and B.3:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate for the recirculating and fresh water.
3. The deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
0.23 lb/hr PM/PM10
1.0 TPY PM/PM10

Applicable Compliance Method:

Compliance with the emission limitation shall be determined by multiplying the production

Givau

PTI A

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

rate (lb/hr) by the loss factor (0.05) by the control efficiency of the scrubber (1-0.97). Annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year and dividing by 2000 lbs/ton. The emissions factors were provided in PTI application 14-05386 submitted November 27, 2002.

b. Emission Limitation:

0.81 lb/hr OC

3.55 TPY OC

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor, 27 lbs/hr, by the control efficiency of the thermal oxidizer (1-0.97). Annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year and dividing by 2000 lbs/ton. The emissions factors were provided in PTI application 14-05386 submitted November 27, 2003.

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate but no later than 180 days after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the organic compound and particulate emission limits and the overall control efficiency for organic compounds (See term F.1).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds Method 25 of 40 CFR Part 60, Appendix A - if applicable; for particulate emissions Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. The overall control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) for organic compounds shall be determined in

Emissions Unit ID: **P002**

accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol (e.g., "the mass balance protocol approved 10/25/95").

Not later than 30 days prior to the proposed test date(s), the permittee shall submit and "Intent to test" notification to the appropriate Ohio EPA District Office or local air agency.

The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s).

Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with the visible particulate emission limitation established in OAC rule 3745-17-07(A)(1) stated in term A.1 shall be determined by the methods specified in 40 CFR Part 60 Appendix A, Method 9.

F. Miscellaneous Requirements

1. Since emissions units P002 and P003 have a combined stack, the allowable emission rates during performance tests will be determined by adding together the hourly allowable emission rates for emissions unit P002 and P003.

Givau

PTI A

Emissions Unit ID: P003

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P003 - Spray Dryer 5	OAC rule 3745-31-02(A)(2)	0.23 lb/hour PM/PM10 1.0 TPY PM/PM10 0.81 lb/hour OC 3.55 TPY OC
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

Emissions Unit ID: **P003**

- 2.a** The hourly and annual emission limitations outlined in term A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limits.

Issued: To be entered upon final issuance

- 2.b Compliance with OAC rule 3745-31-02(A)(2) shall be demonstrated by the use of a scrubber with at least a 97% control efficiency and a thermal oxidizer with at least a 97% control efficiency.

B. Operational Restrictions

1. The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 1.0 inch of water at all times while the emissions unit is in operation.
3. The scrubber water flow rate shall be maintained at a value of not less than 500 gallons per minute of recirculating water and 10 gallons per minute of fresh water at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

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

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

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate for the recirculating and

Givau

PTI A

Emissions Unit ID: **P003**

Issued: To be entered upon final issuance

fresh water 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.

Issued: To be entered upon final issuance

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 for the recirculating and fresh water, 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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in term B.1.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels specified in terms B.2 and B.3:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate for the recirculating and fresh water.
3. The deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
0.23 lb/hr PM/PM10
1.0 TPY PM/PM10

Applicable Compliance Method:

Compliance with the emission limitation shall be determined by multiplying the production

Emissions Unit ID: **P003**

rate (lb/hr) by the loss factor (0.05) by the control efficiency of the scrubber (1-0.97). Annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year and dividing by 2000 lbs/ton. The emissions factors were provided in PTI application 14-05386 submitted November 27, 2002.

b. Emission Limitation:

0.81 lb/hr OC
3.55 TPY OC

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor, 27 lbs/hr, by the control efficiency of the thermal oxidizer (1-0.97). Annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year and dividing by 2000 lbs/ton. The emissions factors were provided in PTI application 14-05386 submitted November 27, 2003.

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate but no later than 180 days after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the organic compound and particulate emission limits and the overall control efficiency for organic compounds (See term F.1).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds Method 25 of 40 CFR Part 60, Appendix A - if applicable; for particulate emissions Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. The overall control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) for organic compounds shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the

Givau

PTI A

Emissions Unit ID: **P003**

Issued: To be entered upon final issuance

approved alternative test protocol (e.g., "the mass balance protocol approved 10/25/95").

Not later than 30 days prior to the proposed test date(s), the permittee shall submit and "Intent to test" notification to the appropriate Ohio EPA District Office or local air agency.

The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s).

Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with the visible particulate emission limitation established in OAC rule 3745-17-07(A)(1) stated in term A.1 shall be determined by the methods specified in 40 CFR Part 60 Appendix A, Method 9.

F. Miscellaneous Requirements

1. Since emissions units P002 and P003 have a combined stack, the allowable emission rates during performance tests will be determined by adding together the hourly allowable emission rates for emissions unit P002 and P003.