



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: FINAL PERMIT TO INSTALL
HAMILTON COUNTY
Application No: 14-04837**

CERTIFIED MAIL

DATE: May 24, 2000

Baerlocher USA
Thomas Kaseler
PO Box 545 3676 Davis Rd
Dover, OH 44622-0545

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

HCDES

David Scharfenberger, Communities United for
Action



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: May 24, 2000
Effective Date: May 24, 2000**

FINAL PERMIT TO INSTALL 14-04837

Application Number: 14-04837
APS Premise Number: 1431074043
Permit Fee: **\$5200**
Name of Facility: Baerlocher USA
Person to Contact: Thomas Kaseler
Address: PO Box 545 3676 Davis Rd
Dover, OH 44622-0545

Location of proposed air contaminant source(s) [emissions unit(s)]:
**9999 Highland Ridge Dr
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Plastics additives manufacturing.

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 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 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

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 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.

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(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

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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	5.41
PM-10	5.32
SO₂	0.05
NO_x	4.18
CO	7.02
OC	2.66

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>
B001 - 19.07 MMBtu/hr natural gas fired boiler	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-10*
	40 CFR Part 60, Subpart Dc
	OAC rule 3745-15-07
	OAC rule 3745-18-06*
	OAC rule 3745-23-06*
	OAC rule 3745-31-05(A)(3)

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Emissions Unit ID: **B001**

Applicable Emissions
Limitations/Control Measures

See term C.1 and D.1

See Part I, term A.7

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.

* The emission limitation(s) established by this rule is less stringent than those established by OAC rule 3745-31-05(A)(3).

* The emission limitation(s) established by this rule is less stringent than those established by OAC rule 3745-31-05(A)(3).

* The emission limitation(s) established by this rule is less stringent than those established by OAC rule 3745-31-05(A)(3).

0.0076 lb PM/MMBtu,
0.63 TPY PM
0.0076 lb PM-10/MMBtu,
0.63 TPY PM-10
0.0006 lb SO₂/MMBtu,
0.05 TPY SO₂
0.05 lb NO_x/MMBtu,
4.18 TPY NO_x
0.084 lb CO/MMBtu,

7.02 TPY CO
0.011 lb VOC/MMBtu.
0.92 TPY VOC

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Emissions Unit ID: **B001**

2. Additional Terms and Conditions

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

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.

B. Operational Restrictions

1. Emissions unit B001 shall utilize only natural gas as fuel.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall record and maintain records of the amounts of natural gas combusted during each day.

D. 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

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Emissions Unit ID: **F001**

and

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

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

20% opacity from stack

Applicable Compliance Method:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:

0.0076 lb PM/MMBtu,
0.0076 lb PM-10/MMBtu,
0.0006 lb SO₂/MMBtu,
0.05 lb NO_x/MMBtu,
0.084 lb CO/MMBtu,
0.011 lb VOC/MMBtu.

Applicable Compliance Method:

Compliance shall be demonstrated by using the emission factors from USEPA reference document AP-42, fifth edition, Section 1.4, table 1.4-1 and 1.4-2. natural gas combustion. (revised 7/98).

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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Emissions Unit ID: F001

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>
F001 - raw material unloading	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11*	* The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3)	0.13 lb PM/hr 0.11 lb PM-10/hr 0.59 TPY PM 0.50 TPY PM-10
	OAC rule 3745-15-07	See Part I, term A.7.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of fabric filters to control particulate emissions.

B. Operational Restrictions

None

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Emissions Unit ID: F001

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall visually inspect each of the control devices which are required to control particulate emissions from emissions unit F001 for visible holes or tears, bag leaks, and excessive dusting or visible emissions on a monthly basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected.

The permittee shall maintain monthly records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
If no problems (malfunctions) were observed a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

20% opacity from stack

Applicable Compliance Method:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:

0.13 lb PM/hr, 0.11 lb PM-10/hr; 0.59 TPY PM, 0.50 TPY PM-10.

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Emissions Unit ID: **F001**

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Emissions Unit ID: **F001**

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be determined by using emission factors from USEPA reference document AP-42, Section 11.17, fifth edition, February, 1998.

F. Miscellaneous Requirements

None

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>
P001 - metallic stearate manufacturing process #1	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11*	* The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05(A)(3)	0.30 lb PM-PM10/hr 1.33 TPY PM-PM10

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of fabric filters to control particulate emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: **P001**

1. The permittee shall visually inspect each of the control devices which are required to control particulate emissions from emissions unit P001 for visible holes or tears, bag leaks, and excessive dusting or visible emissions on a monthly basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected.

The permittee shall maintain monthly records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
If no problems (malfunctions) were observed a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

20% opacity from stack

Applicable Compliance Method:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:

0.30 lb PM-PM10/hr, 1.33 TPY PM-PM10

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be demonstrated by the

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Emissions Unit ID: **P001**

emission factors, control efficiencies and the operational parameters as submitted in PTI application 14-04837 submitted October 28, 1999.

F. Miscellaneous Requirements

None

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Issued: May 24, 2000

Emissions Unit ID: P002

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 - metallic stearate manufacturing process #2	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11*	* The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05(A)(3)	0.21 lb PM-PM10/hr 0.90 TPY PM-PM10

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of fabric filters to control particulate emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall visually inspect each of the control devices which are required to control particulate emissions from emissions unit P002 for visible holes or tears, bag leaks, and excessive dusting or visible emissions on a monthly basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected.

The permittee shall maintain monthly records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
If no problems (malfunctions) were observed a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

20% opacity from stack

Applicable Compliance Method:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:

0.21 lb PM-PM10/hr, 0.90 TPY PM-PM10

Applicable Compliance Method:

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Emissions Unit ID: P003

Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies and the operational parameters as submitted in PTI application 14-04837 submitted October 28, 1999.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P003 - metallic stearate manufacturing process #3	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11*	* The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05(A)(3)	0.17 lb PM-PM10/hr 0.76 TPY PM-PM10

2. Additional Terms and Conditions

- Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of fabric filters to control particulate emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall visually inspect each of the control devices which are required to control particulate emissions from emissions unit P003 for visible holes or tears, bag leaks, and excessive dusting or visible emissions on a monthly basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected.

The permittee shall maintain monthly records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
If no problems (malfunctions) were observed a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

20% opacity from stack

Applicable Compliance Method:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in

40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:

0.17 lb. PM-PM10/hr, 0.76 TPY PM10

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies and the operational parameters as submitted in PTI application 14-04837 submitted October 28, 1999.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P004 - metallic stearate (Baeropol) manufacturing process #4	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11*	* The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05(A)(3)	0.10 lb PM-PM10/hr

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0.44 TPY PM-PM10

Emissions Unit ID: **P004**

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of fabric filters to control particulate emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall visually inspect each of the control devices which are required to control particulate emissions from emissions unit P004 for visible holes or tears, bag leaks, and excessive

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Emissions Unit ID: **P004**

dusting or visible emissions on a monthly basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected.

The permittee shall maintain monthly records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
If no problems (malfunctions) were observed a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

20% opacity from stack

Applicable Compliance Method:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:

0.10 lb PM-PM10/hour, 0.44 TPY PM-PM10

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies and the operational parameters as submitted in PTI

application 14-04837 submitted October 28, 1999.

F. Miscellaneous Requirements

None

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>
P005 - metallic stearate manufacturing process #5	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11*	* The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05(A)(3)	0.07 lb PM-PM10/hr 0.29 TPY PM-PM10
	OAC rule 3745-15-07	See Part I, term A.7

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of fabric filters to control particulate emissions.

B. Operational Restrictions

Baer]
PTI /
Issued: May 24, 2000

Emissions Unit ID: **P005**

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall visually inspect each of the control devices which are required to control particulate emissions from emissions unit P005 for visible holes or tears, bag leaks, and excessive

Baer]

PTI /

Issued: May 24, 2000

Emissions Unit ID: **P005**

dusting or visible emissions on a monthly basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected.

The permittee shall maintain monthly records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
If no problems (malfunctions) were observed a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

20% opacity from stack

Applicable Compliance Method:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:

0.07 lb PM-PM10/hr, 0.29 TPY PM-PM10

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies and the operational parameters as submitted in PTI

Baer]

PTI /

Issued: May 24, 2000

Emissions Unit ID: P006

application 14-04837 submitted October 28, 1999.

F. Miscellaneous Requirements

None

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>
P006 - metallic stearate mixing process #6	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11*	* The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05(A)(3)	0.11 lb PM-PM10/hr 0.47 TPY PM-PM10
	OAC rule 3745-15-07	See Part I, term A.7

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of fabric filters to control particulate emissions.

B. Operational Restrictions

Baer]
PTI /
Issued: May 24, 2000

Emissions Unit ID: **P006**

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall visually inspect each of the control devices which are required to control particulate emissions from emissions unit P006 for visible holes or tears, bag leaks, and excessive

Baer]

PTI /

Issued: May 24, 2000

Emissions Unit ID: **P006**

dusting or visible emissions on a monthly basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected.

The permittee shall maintain monthly records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
If no problems (malfunctions) were observed a report is required stating so.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

20% opacity from stack

Applicable Compliance Method:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined using the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:

0.11 lb PM-PM10/hr, 0.47 TPY PM-PM10

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies and the operational parameters as submitted in PTI

Baer]

PTI /

Issued: May 24, 2000

Emissions Unit ID: T001

application 14-04837 submitted October 28, 1999.

F. Miscellaneous Requirements

None

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>
T001 - 18,492 Gallon Fixed Roof Storage Tank - TK1	OAC rule 3745-21-07(D)	Exempt
	OAC rule 3745-31-05(A)(3)	0.87 TPY OC
	40 CFR Part 60, Subpart Kb	See term C.1

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with specified emission limits.
- 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.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. In accordance with 40 CFR Part 60.116b(a) and (b), the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the storage vessel.

Baer]

PTI /

Issued: May 24, 2000

Emissions Unit ID: **T001**

D. 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. Date of performance testing (if required, at least 30 days prior to testing).

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

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

0.87 tons OC/yr

Applicable Compliance Method:

Compliance shall be determined using emission factors calculated using USEPA reference document AP-42, Section 7.1, Fifth Edition, revised February, 1996.

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PTI /

Issued: May 24, 2000

Emissions Unit ID: **T001**

F. Miscellaneous Requirements

None

Baer

PTI

Issued: May 24, 2000

Emissions Unit ID: T002

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>
T002 - 18,492 Gallon Fixed Roof Storage Tank - TK2	OAC rule 3745-21-07(D)	Exempt
	OAC rule 3745-31-05(A)(3)	0.87 TPY OC
	40 CFR Part 60, Subpart Kb	See term C.1.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with specified emission limits.
- 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.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. In accordance with 40 CFR Part 60.116b(a) and (b), the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the storage vessel.

Baer]
PTI /
Issued: May 24, 2000

Emissions Unit ID: **T002**

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PTI /

Issued: May 24, 2000

Emissions Unit ID: T002

D. 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. Date of performance testing (if required, at least 30 days prior to testing).

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

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

0.87 tons OC/yr

Applicable Compliance Method:

Compliance shall be determined using emission factors calculated using USEPA reference document AP-42, Section 7.1, Fifth Edition, revised February, 1996.

Baerlocher USA
PTI Application 14 04827
Issue

Facility ID: 1431074043

Emissions Unit ID: **T002**

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837

Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing

CITY/TWP Cincinnati

Emissions Unit ID: T002

SIC CODE 2869

SCC CODE 3-01-900-03

EMISSIONS UNIT ID B001

EMISSIONS UNIT DESCRIPTION 19.02 MMBtu/hr natural gas fired boiler

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Lb/MMBtu	Tons Per Year	Lb/MMBtu	Tons Per Year
Particulate Matter	A	0.0076	0.63	0.0076	0.63
PM ₁₀	A	0.0076	0.63	0.0076	0.63
Sulfur Dioxide	A	0.0006	0.05	0.0006	0.05
Organic Compounds	P	0.011	0.92	0.011	0.92
Nitrogen Oxides	A	0.05	4.18	0.05	4.18
Carbon Monoxide	A	0.084	7.02	0.084	7.02
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS - Subpart Dc

NESHAP?

PSD?

OFFSET POLICY?

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

Use of low-NOx burners, exclusive use of natural gas as fuel, compliance with specified emissions limits.

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: _____

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837 Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

Emissions Unit ID: T002

SIC CODE 2869 SCC CODE 3-01-830-01 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION raw material unloading

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Pounds per Hour	Tons Per Year	Pounds per Hour	Tons Per Year
Particulate Matter	A	0.13	0.02	0.13	0.59
PM ₁₀	A	0.11	0.02	0.11	0.50
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Use of fabric filter to control particulate emissions.

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:

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837 Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

Emissions Unit ID: T002

SIC CODE 2869 SCC CODE 3-01-132-99 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION metallic stearate manufacturing process #1

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Pounds per Hour	Tons Per Year	Pounds per Hour	Tons Per Year
Particulate Matter	A	0.02	0.85	0.30	1.33
PM ₁₀	A	0.02	0.85	0.30	1.33
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Use of fabric filters to control particulate emissions.

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:

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837 Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

Emissions Unit ID: T002

SIC CODE 2869 SCC CODE 3-01-132-99 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION metallic stearate manufacturing process #2

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Pounds per Hour	Tons Per Year	Pounds per Hour	Tons Per Year
Particulate Matter	A	0.13	0.57	0.21	0.90
PM ₁₀	A	0.13	0.57	0.21	0.90
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Use of fabric filters to control particulate emissions.

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:

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **T002**

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

SIC CODE 2869 SCC CODE 3-01-132-99 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION metallic stearate manufacturing process #3

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Pounds per Hour	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	A	0.11	0.48	0.17	0.76
PM ₁₀	A	0.11	0.48	0.17	0.76
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

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

Use of fabric filters to control particulate emissions.

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: _____

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837 Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

Emissions Unit ID: T002

SIC CODE 2869 SCC CODE 3-01-132-99 EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION metallic stearate manufacturing process #4

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Pounds per Hour	Tons Per Year	Pounds per Hour	Tons Per Year
Particulate Matter	A	0.07	0.31	0.10	0.44
PM ₁₀	A	0.07	0.31	0.10	0.44
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Use of fabric filters to control particulate emissions.

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:

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837 Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

Emissions Unit ID: T002

SIC CODE 2869 SCC CODE 3-01-132-99 EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION metallic stearate manufacturing process #5

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Pounds per Hour	Tons Per Year	Pounds per Hour	Tons Per Year
Particulate Matter	A	0.04	0.19	0.07	0.29
PM ₁₀	A	0.04	0.19	0.07	0.29
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Use of fabric filters to control particulate emissions.

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:

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **T002**

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

SIC CODE 2869 SCC CODE 3-01-132-99 EMISSIONS UNIT ID P006

EMISSIONS UNIT DESCRIPTION metallic stearate manufacturing process #6

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Pounds per Hour	Tons Per Year	Pounds per Hour	Tons Per Year
Particulate Matter	A	0.08	0.33	0.11	0.47
PM ₁₀	A	0.08	0.33	0.11	0.47
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

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

Use of fabric filters to control particulate emissions.

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: _____

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837 Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

Emissions Unit ID: T002

SIC CODE 2869 SCC CODE 4-07-999-98 EMISSIONS UNIT ID T001

EMISSIONS UNIT DESCRIPTION fixed roof storage tank with a capacity less than 40000 gallons

DATE INSTALLED Not begun

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					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	P		0.19		0.87
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS - Subpart Kb NESHAP? PSD? OFFSET POLICY?

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

Compliance with specified emission limits.

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:

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837 Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati

Emissions Unit ID: **T002**

SIC CODE 2869 SCC CODE 4-07-999-98 EMISSIONS UNIT ID T002

EMISSIONS UNIT DESCRIPTION fixed roof storage tank with a capacity less than 40000 gallons

DATE INSTALLED not begun

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					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	P		0.19		0.87
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS - Subpart Kb NESHAP? PSD? OFFSET POLICY?

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

Compliance with specified emission limits.

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: _____

49 **NEW SC**

PTI Num

FACILITY

FACILITY DESCRIPTION Plastics additives manufacturing CITY/TWP Cincinnati Emissions Unit ID: **T002** _____

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:

This permit should be issued in draft due to public concern in this area.

Permit Review Narrative

PTI 14-04837

Baerlocher U.S.A.
Highland Ridge Drive
Cincinnati, Ohio 45232

PN: 1431074043

This application covers the installation of a plastics additives manufacturing facility. The emissions units will consist of a steam boiler (B001), a storage silo (F001), six process units (P001 - P006) and two storage tanks (T001, T002).

Applicable rules:

- 40 CFR Part 60, Subpart Dc (NSPS for steam generating units)
- 40 CFR Part 60, Subpart Kb (NSPS for VOL storage tanks)
- OAC rule 3745-15-07 (air pollution nuisance prohibited)
- OAC rule 3745-17-07(A) (visible emissions limitations)
- OAC rule 3745-17-10 (PE from fuel burning equipment)
- OAC rule 3745-17-11 (PE from processes)
- OAC rule 3745-18-06 (sulfur dioxide emissions)
- OAC rule 3745-23-06 (nitrogen oxides emissions)
- OAC rule 3745-31-05(A)(3) (BAT requirements)

BAT determination:

B001 - Use of low-NOx burners, exclusive use of natural gas as fuel and compliance with specified emissions limits.

F001 - Use of fabric filter to control particulate emissions.

P001 thru P006 - Use of fabric filter to control particulate emissions.

T001, T002 - Compliance with specified emission limit.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04837

Facility ID: 1431074043

FACILITY NAME Baerlocher USA

FACILITY DESCRIPTION Plastics additives manufacturing

CITY/TWP Cincinnati

Emissions Unit ID: **T002**

Emissions summary:

See emissions summary sheet for emission details. Allowable emissions are equal to maximum potential emissions. Emissions were based on information provided by the company.

Permit recommendation:

All emissions units at this facility will comply with all applicable regulations, therefore approval is recommended.

Permit fee:

Emissions Unit PWR, HI or cap. Permit Fee

B001	19.07 MMBtu/hr	\$200.00
F001	122,000 lbs/hr	\$800.00
P001	13,891 lbs/hr	\$800.00
P002	13,891 lbs/hr	\$800.00
P003	13,891 lbs/hr	\$800.00
P004	3,087 lbs/hr	\$400.00
P005	13,891 lbs/hr	\$800.00
P006	3,087 lbs/hr	\$400.00
T001	18,500 gallons	\$100.00
T002	18,500 gallons	\$100.00

Total \$5,200.00

Prepared by: Peter Sturdevant
Date prepared: December 1, 1999

Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

51 **NEW SC**

PTI Num

FACILITY

FACILITY DESCRIPTION Plastics additives manufacturing

CITY/TWP Cincinnati

Emissions Unit ID: **T002** _____

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	5.41
PM-10	5.32
SO ₂	0.05
NO _x	4.18
CO	7.02
OC	2.66