

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 14-01888

**A. Source Description:**

Procter & Gamble Miami Valley Laboratories has applied for a Federally Enforceable Permit for an existing incinerator referenced above. This emissions unit is a 250 lb/hr infectious waste incinerator.

**B. Facility Emissions and Attainment Status:**

Procter & Gamble Miami Valley Laboratories, located in Hamilton County, is a minor source for all criteria pollutants. Hamilton County is in attainment for all criteria pollutants except ozone.

**C. Source Emissions:**

This permit will have federally enforceable limitations which will limit emissions unit N003 to combusting a fuel feed stream, 10 percent or less of the weight of which is comprised, in aggregate, of hospital waste and medical/infectious waste as measured on a calendar quarter basis. The HCl emissions will also be limited to 5.0 tons per year.

**D. Conclusion:**

This permit will have federally enforceable limitations which will limit emissions unit N003 to combusting a fuel feed stream, 10 percent or less of the weight of which is comprised, in aggregate, of hospital waste and medical/infectious waste as measured on a calendar quarter basis. Emissions unit N003 will meet the definition of "co-fired combustor" as defined in 40 CFR 62.14490, and will be exempt from 40 CFR Part 62, Subpart HHH. This permit will also exempt Procter & Gamble Miami Valley Laboratories from the requirement to obtain a Title V permit. Quarterly records of the weight of waste combusted will be required to demonstrate compliance with the co-fired combustor exemption. This permit will limit the HCl emissions to 5.0 TPY so the facility will not be major for Maximum Achievable Control Technology (MACT) and Title V. Because the allowable HCl emissions are less than 10 TPY, the permittee will not be subject to the requirements of the Maximum Achievable Control Technology Standards or Part 70 Title V requirements.

**RE: DRAFT PERMIT TO INSTALL MODIFICATION HAMILTON COUNTY** **CERTIFIED MAIL**  
**Application No: 14-01888**  
**DATE: 9/24/2002**

Procter and Gamble Miami Valley Labs  
Jim Dean  
11810 East Miami River Road  
Cincinnati, OH 45252

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of \$ 200 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*  
Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA HCDES OH-KY-IN Regional Council of Gov. KY IN



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 14-01888**

Application Number: 14-01888  
APS Premise Number: 1431091728  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Procter and Gamble Miami Valley Labs  
Person to Contact: Jim Dean  
Address: 11810 East Miami River Road  
Cincinnati, OH 45252

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**11810 East Miami River Road  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**224 lbs/hr infectious waste incinerator, Modification of PTI 14-01888.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Procter and Gamble Miami Valley Labs**  
**PTI Application: 14-01888**  
**Issued: To be entered upon final issuance**

**Facility ID: 1431091728**

## **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

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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

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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 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**

- 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

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit..

#### **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/PM-10	1.1
SO2	1.19
NOx	1.97
CO	1.62
VOC	0.08

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HCl	5.0
Arsenic	0.02
Beryllium	0.033
Cadmium	0.044
Chromium	0.007
Lead	0.3
Mercury	0.05
Nickel	0.033

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**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>	OAC rule 3745-31-05(D)
N003 - 224 lbs/hr infectious waste incinerator with wet scrubber derated from 250 lbs/hr - Modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-75-02 thru 3745-75-05

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	<p style="text-align: center;"><u>Applicable Emissions Limitations/Control Measures</u></p>	
<p>OAC rule 3745-17-07(A)</p>	<p>0.10 lb of PM-PM10/100 lbs waste charged;</p>	<p>4.0 lbs/hr hydrogen chloride 100 ppm by volume of carbon monoxide on a dry basis, adjusted to 7% oxygen as an hourly average.</p>
<p>OAC rule 3745-17-09</p>	<p>1.1 ton per year of PM/PM10;</p>	<p>0.0042 lb/hr arsenic and compounds;</p>
	<p>0.27 lb/hour SO2</p>	<p>0.0076 lb/hr beryllium and compounds;</p>
	<p>1.19 tons per year of SO2;</p>	<p>0.010 lb/hr cadmium and compounds;</p>
	<p>0.37 lb/hour CO</p>	<p>0.0015 lb/hr chromium and compounds;</p>
	<p>1.62 tons per year of CO;</p>	<p>0.068 lb/hr lead and compounds;</p>
	<p>0.45 lb/hour NOx</p>	<p>0.011 lb/hr mercury and compounds;</p>
	<p>1.97 tons per year of NOx;</p>	<p>0.0076 lb/hr nickel and compounds.</p>
	<p>0.018 lb/hour VOC</p>	
	<p>0.08 tons per year of VOC</p>	
	<p>0.02 TPY Arsenic and compounds.</p>	<p>Visible particulate emissions from any stack shall not exceed 5% opacity, except for six minutes in any continuous 60-minute period during which the opacity shall not exceed 10%.</p>
	<p>0.033 TPY Beryllium and compounds.</p>	
	<p>0.044 TPY Cadmium and compounds.</p>	
	<p>0.007 TPY Chromium and compounds.</p>	
	<p>0.3 TPY Lead and compounds.</p>	<p>See terms B.1, B.3, B.4, B.6 and B.13 - B.16.</p>
	<p>0.05 TPY Mercury and compounds.</p>	
	<p>0.033 TPY Nickel and compounds.</p>	
	<p>See terms B.2, B.5, B.7, B.8, B.10 - B.12, B.17 and B.18.</p>	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-75.</p>	<p>Exempt</p>
	<p>5.0 tons per year of HCl, as a rolling, 12-month summation.</p>	
	<p>See term B.9.</p>	

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**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a scrubber, compliance with the emission limits and the use of a afterburner with a two second retention time in the secondary chamber.

**B. Operational Restrictions**

1. The primary combustion chamber for this incinerator shall be maintained so that the exit gas is at a minimum temperature of 1200 degrees Fahrenheit. The secondary combustion chamber for this

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- incinerator shall be operated so that the exit gas temperature is at a minimum of 1800 degrees Fahrenheit.
2. The secondary combustion chamber of this incinerator shall allow for a 2-second retention time at 1800 degrees Fahrenheit, in accordance with OAC rule 3745-75-03(D).
  3. This incinerator, including all associated equipment and grounds, shall be designed, operated and maintained to prevent the emission of objectionable odors.
  4. The permittee shall not intentionally dispose of the following items by burning in the incinerator:
    - a. visible globules of mercury;
    - b. nickel-cadmium batteries; and
    - c. switches, thermometers, batteries and other devices containing mercury.
  5. Radioactive waste shall not be charged to this incinerator. For purposes of this permit, radioactive waste shall be defined as any waste which measures above ambient background levels of radiation. All radioactive infectious waste shall be managed in accordance with the applicable rules of the Ohio Department of Health and the regulations of the U. S. Nuclear Regulatory Commission.
  6. This incinerator shall be operated only by properly trained personnel. A minimum of 40 hours of incinerator operation training shall be provided to each operator before he or she is allowed to operate this incinerator. This may include, for each operator, the successful completion of the training course for the operation and maintenance of hospital medical waste incinerators developed by the Control Technology Center, U.S. EPA, courses or instructions provided by incinerator manufacturers, professional engineering organizations, colleges or universities, or Ohio EPA. A copy of all the training records for each operator shall be maintained on file for a period of 5 years and shall be immediately available to the Director upon request.
    - a. This emissions unit shall not be charged with waste unless the scrubber is operational.
    - b. The rated capacity (quantity of waste incinerated) of this emissions unit is being derated from 250 lbs/hour to 224 lbs/hour based on a previous performance test. The permittee will demonstrate compliance with this restriction based on the recordkeeping in term C.3.
    - c. This incinerator is limited to combusting a fuel feed stream containing 10 percent or less, by weight, in aggregate, of hospital waste and medical/infectious waste, as measured on a calendar quarter basis. For purposes of this limitation, pathological waste, chemotherapeutic waste, and low-level radioactive waste are considered "other" wastes when calculating the percentage of hospital waste and

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medical/infectious waste combusted. For purposes of this limitation, the terms "hospital waste", "medical/infectious waste", "pathological waste", "chemotherapeutic waste", and "low-level radioactive waste" shall have the same definitions as those set forth in 40 CFR 62.14490.

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- d. The pressure drop across the wet scrubber shall be maintained within the range established during the most recent performance test that demonstrated that the emissions unit was in compliance.
- e. The water flow rate of the wet scrubber shall be maintained at a minimum level that is no less than that established during the most recent performance test that demonstrated that the emissions unit was in compliance.
- f. The scrubber liquor pH shall be maintained at a level that is no less than the minimum established during the most recent performance test that demonstrated that the emissions unit was in compliance.
- g. All infectious waste shall be incinerated in a controlled air, multi-chamber incinerator, or equivalent technology as approved by the Director, which provides complete combustion of the waste, excluding metallic items, to carbonized or mineralized ash. Any ash that does not meet this criterion shall be re-incinerated.
- h. This incinerator shall incorporate a lockout system which will prevent the ignition of waste until the exit gas temperature of the secondary combustion chamber reaches 1800 degrees Fahrenheit
- i. The stack(s) for this incinerator shall be designed to minimize the impact of the emissions on employees, residents, patients, visitors, and nearby residences. The design shall meet good engineering practices so as not to cause excessive concentrations of any air contaminant at any air intake for heating and cooling of any building or at operable windows or doors.
- j. If this incinerator is mechanically fed, it must be equipped with an air lock system to prevent opening the incinerator to the room environment.
- k. This incinerator shall be equipped with an air pollution control device designed to reduce hydrogen chloride emissions and provide for continuous compliance with the hydrogen chloride emission limits when the unit is in operation.
- l. Materials listed as hazardous in 40 CFR Part 261 Subpart D shall not be incinerated in this emissions unit.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the primary combustion exhaust gas temperature, the secondary combustion exhaust gas temperature, and the bypass stack temperature (if applicable) when the incinerator is in operation. Units shall be in degrees Fahrenheit. Accuracy for each thermocouple, monitor and

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recorder shall be guaranteed by the manufacturer to be within +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

2. The permittee shall operate and maintain equipment to continuously monitor the radioactivity of all waste prior to combustion. This monitor shall be equipped with an alarm which sounds a warning when radioactive waste is present. For purposes of this permit, radioactive waste shall be defined as any waste which measures above ambient background levels of radiation. All radioactive infectious waste shall be managed in accordance with the applicable rules of the Ohio Department of Health and the regulations of the United States Nuclear Regulatory Commission.
3. A scale (accurate to within one pound) shall be installed near this incinerator to weigh all of the material charged to the unit. A written log shall be kept to record the type and amount of material charged to this unit on a pounds per hour basis. The type shall be classified to demonstrate compliance with the limits in term B.9. Alternative arrangements may be approved by the Director provided they can be shown to be of equivalent effectiveness as a method of regulating flow into the incinerator and generating a permanent record of charging rates.
4. A logbook shall be maintained for each continuous emissions monitoring system installed on this incinerator to document all activities involving the monitoring systems. Appropriate records should include, as a minimum, preventive maintenance, quality assurance and corrective action activities. The logbook shall be kept on file for a period of 5 years and shall be made available for inspection by the Ohio EPA or its authorized representatives at any reasonable time.
5. The incinerator shall be inspected monthly using preventive maintenance procedures recommended by the equipment manufacturer. Each inspection shall include a written report identifying any needed repairs to the unit. If repairs are needed, the incinerator shall not be operated if the operation would result in any exceedance of the emission limits detailed in this permit. These repairs shall be completed within 30 days of the inspection. If a time period longer than 30 days is needed to complete the repairs, the appropriate Ohio EPA District Office or local air agency shall be notified in writing. This notice shall list the repairs needed and the reason(s) the repairs could not be accomplished within the required time period. All inspection and repair reports shall be kept by the permittee for a period of 5 years and shall be made available to the Director upon request.
6. The permittee shall maintain quarterly records of all instances during which the percent, by weight, of hospital waste and medical/infectious waste exceeded the allowable restriction of 10 percent, by weight, in the fuel feed for the incinerator.
7. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the scrubber, the scrubber water flow rate, and the pH of the liquid, while the emissions unit

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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.

The permittee shall collect and record the following information on a daily basis:

- a. The pressure drop across the scrubber, in inches of water
  - b. The scrubber water flow rate, in gallons per minute
  - c. The pH of the scrubber liquor
  - d. The downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
8. The permittee shall maintain monthly records of the updated rolling 12-month summation of the total HCl emissions from this emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which provide the following information for each period during which the primary or secondary combustion chamber exhaust gas temperatures fall below the applicable limitations or emission limitations are exceeded:
  - a. the date of the excursion;
  - b. the time interval over which the excursion occurred;
  - c. the temperature values during the excursion;
  - d. the cause(s) for the excursion;
  - e. the corrective action which has been or will be taken to prevent similar excursions in the future; and
  - f. an identification of all hours of operation during which the charge rate exceeded the incinerator's design capacity, including the actual charge rates for all such hours of operation.
2. The permittee shall submit annual reports which provide the total amount of infectious waste incinerated, in tons. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all instances during which the percent, by weight, of hospital waste and medical/infectious waste exceeded the allowable restriction of 10 percent, by weight, in the fuel feed for the incinerator.
4. The permittee shall submit annual reports that summarize the actual annual emissions for

particulates, SO<sub>2</sub>, CO, NO<sub>x</sub>, VOC and HCl for the previous calendar year. These reports should be submitted by January 31 of each year.

5. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber water flow rate.
  - c. The scrubber liquor pH.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the HCl limitation, as a rolling, 12-month summation for this emissions unit.
7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the throughput limit in term B.8.
8. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the PM, HCl, CO, arsenic, beryllium, cadmium, chromium, lead, mercury, nickel and the visible particulate emissions limitation identified in term A.1.
9. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **E. Testing Requirements**

1. The permittee shall conduct performance tests to demonstrate compliance with the allowable mass emissions rates or control efficiency rate as specified in OAC rule 3745-75-02(A) through (F), as applicable, for particulates, hydrogen chloride, carbon monoxide, arsenic, beryllium, cadmium, chromium, lead, mercury, and nickel at least once every three years. The emissions test(s) shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-75-06; 40 CFR Part 60, Appendix A, Methods 1-5, 26A, 10, and 29, respectively. The test(s) shall be conducted under maximum charging rates unless otherwise specified or approved by the Ohio EPA.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit 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

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test(s) may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emission test(s) shall be submitted to the Hamilton County Department of Environmental Services 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 Ohio EPA Central District Office.

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2. Compliance with the visible emissions limitation in term A.1. of these terms and conditions shall be demonstrated by Method 9 of 40 CFR Part 60, Appendix A.
3. 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 Limitations:

4.0 lbs/hr hydrogen chloride

100 ppm by volume of carbon monoxide on a dry basis, adjusted to 7% oxygen as an hourly average.

0.0042 lb/hr Arsenic and compounds;

0.0076 lb/hr Beryllium and compounds;

0.010 lb/hr Cadmium and compounds;

0.0015 lb/hr Chromium and compounds;

0.068 lb/hr Lead and compounds;

0.011 lb/hr Mercury and compounds;

0.0076 lb/hr Nickel and compounds.

0.10 lb of PM-PM10/100 lbs waste charged;

## Applicable Compliance Method:

Compliance shall be determined by the performance testing required in term E.1.

## b. Emission Limitations:

0.02 TPY Arsenic and compounds.

0.033 TPY Beryllium and compounds.

0.044 TPY Cadmium and compounds.

0.007 TPY Chromium and compounds.

0.3 TPY Lead and compounds.

0.05 TPY Mercury and compounds.

0.033 TPY Nickel and compounds.

1.1 ton per year of PM/PM10.

## Applicable Compliance Method:

Compliance shall be determined by multiplying the lb/ton emission factor derived by the performance testing required in term E.1. by the tons of material charged per year divided by 2000 lbs/ton.

4. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be

**Procter and Gamble Miami Valley Labs**

**PTI / ~~14-01000~~**

**Issue**

**Facility ID: 1431091728**

**Emissions Unit ID: N003**

determined in accordance with the following method(s):

**Proc****PTI**Emissions Unit ID: **N003****Issued: To be entered upon final issuance**

## a. Emission Limitations

0.27 lb/hour SO<sub>2</sub>  
 1.19 tons per year of SO<sub>2</sub>;  
 0.37 lb/hour CO  
 1.62 tons per year of CO;  
 0.45 lb/hour NO<sub>x</sub>  
 1.97 tons per year of NO<sub>x</sub>;  
 0.018 lb/hour VOC  
 0.08 tons per year of VOC

## b. Applicable Compliance Method:

Compliance shall be determined by multiplying the lb/ton emission factor derived from AP-42 Table 2.3-1 by the maximum tons of material charged per hour. Compliance with the annual limitations shall be determined by multiplying the lb/ton emission factor by the tons of material charged per year divided by 2000 lbs/ton.

5. Compliance with the 224 lbs/hr limitation in term B.8. shall be demonstrated by the hourly records required in term C.3.
6. During the emission testing required in Section E.1, the permittee shall record the following parameters every 5 minutes:
  - a. the pH of the scrubber liquor;
  - b. the scrubber water flow rate, in gallons per minute; and
  - c. the pressure drop of the scrubber, in inches of water.
7. Compliance with the TPY HCl emission limit shall be determined by the record keeping in term C.8.
8. Compliance with the operational restrictions in terms B.10 - B.12 shall be demonstrated by the record keeping in term C.7.

**F. Miscellaneous Requirements**

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control

**Proc**

**PTI /**

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requirements for this emission unit listed in PTI 14-1888 as issued on April 15 , 1990.