



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
HAMILTON COUNTY**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05105

DATE: 6/19/2001

Rutgers Organics Corp
Carl Deskins
PO Box 398 10740 Paddys Run Rd
Ross, OH 45061

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 Directors 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



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 14-05105

Application Number: 14-05105
APS Premise Number: 1431111828
Permit Fee: **\$2800**
Name of Facility: Rutgers Organics Corp
Person to Contact: Carl Deskins
Address: PO Box 398 10740 Paddys Run Rd
Ross, OH 45061

Location of proposed air contaminant source(s) [emissions unit(s)]:
10740 Paddys Run Rd
Ross, Ohio

Description of proposed emissions unit(s):
two reactor vessels with condenser, two 15,000 gallon fixed roof storage tanks, steam tube dryer, silo storage of phenylsulfonic acid and railcar loading.

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 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

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.

Rutgers Organics Corp
 PTI Application: 14-05105
 Issued: 6/19/2001

Facility ID: 143111828

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	2.73
PM-10	1.11
OC	0.28

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>
F001 - Silo storage of phenolsufonic acid with fabric filter	OAC rule 3745-31-05(A)(3)	0.11 lb/hr and 0.47 TPY PM; 0.11 lb/hr and 0.47 TPY PM10
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(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(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter to control particulate emissions and the visible emissions limitation.
- 2.b The hourly and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

E. Testing Requirements

1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-05105, submitted on February 22, 2001.
2. Compliance with the visible particulate emissions limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

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>
F002 - Railcar filling material separator with fabric filter	OAC rule 3745-31-05(A)(3)	0.11 lb/hr and 0.47 TPY PM 0.11 lb/hr and 0.47 TPY PM10 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(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(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
Railcar loading (fugitive emissions)	OAC rule 3745-31-05(A)(3)	0.10 lb/hr and 0.44 TPY PM 0.01 lb/hr and 0.04 TPY PM10 See terms A.2.c. and A.2.d.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter to control particulate emissions from the railcar filling material separator, compliance with the emissions limitations and the visible emissions limitation.
- 2.b** The hourly and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.
- 2.c** The permittee shall take all steps necessary to ensure proper material load-in procedures, so as to minimize or eliminate visible emissions of fugitive dust.
- 2.d** Fugitive visible particulate emissions from this emissions unit shall not exceed 20 percent opacity, as a three-minute average, except as specified by rule.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

E. Testing Requirements

- 1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-05105, submitted on February 22, 2001.
- 2. Compliance with the visible particulate emissions limitations shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

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>
P003 - 2000 Gallon reactor vessel with wet scrubber	OAC rule 3745-31-05(A)(3)	0.03 lb/hr, 0.69 lb/day and 0.12 TPY OC The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09 (DD).
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart VV	See terms B.1, C.1, D.1, E.2 and F.1
	OAC rule 3745-21-09 (DD)	See terms B.1, C.1, D.1, E.2 and F.1

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a wet scrubber in order to control emissions of organic compounds.
- 2.b The emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

- 2.c** 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. The permittee shall comply with all operational restrictions specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall comply with all monitoring and recordkeeping requirements specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).

D. Reporting Requirements

1. The permittee shall comply with all reporting requirements specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).
2. Pursuant to the NSPS, the source owner/operator 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 163669
Columbus, Ohio 43216-3669

and

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

E. Testing Requirements

1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-05105, submitted on February 22, 2001.
2. The permittee shall comply with all testing requirements specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).

F. Miscellaneous Requirements

1. The permittee shall comply with all miscellaneous requirements specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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>
P004 - 2000 Gallon reactor vessel with wet scrubber	OAC rule 3745-31-05(A)(3)	0.03 lb/hr, 0.69 lb/day and 0.12 TPY OC The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09 (DD).
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart VV	See terms B.1, C.1, D.1, E.2 and F.1
	OAC rule 3745-21-09(DD)	See terms B.1, C.1, D.1, E.2 and F.1

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a wet scrubber in order to control emissions of organic compounds.
- 2.b The emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

- 2.c** 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. The permittee shall comply with all operational restrictions specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall comply with all monitoring and recordkeeping requirements specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).

D. Reporting Requirements

1. The permittee shall comply with all reporting requirements specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).
2. Pursuant to the NSPS, the source owner/operator 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 163669
Columbus, Ohio 43216-3669

and

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

E. Testing Requirements

1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-05105, submitted on February 22, 2001.
2. The permittee shall comply with all testing requirements specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).

F. Miscellaneous Requirements

1. The permittee shall comply with all miscellaneous requirements specified in 40 CFR Part 60, Subpart VV and OAC rule 3745-21-09(DD).
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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>
P032 - Steam tube dryer with venturi scrubber	OAC rule 3745-31-05(A)(3)	0.31 lb/hr and 1.35 TPY PM; 0.03 lb/hr and 0.13 TPY PM10 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(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(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a venturi scrubber to control particulate emissions and the visible emissions limitation.
- 2.b The hourly and annual emissions limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance

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Rutge
PTI A
Issued: 6/19/2001

Emissions Unit ID: **P032**

with these limits.

B. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 1.5 gallons per minute at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The pressure drop across the scrubber, in inches of water, on a daily basis.
- b. The scrubber water flow rate, in gallons per minute, on a daily basis.
- c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The pressure drop across the scrubber.
 - b. The scrubber water flow rate.
2. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

Rutgers Organics Corp
PTI Application: 14-05105
Issued

Facility ID: 143111828

Emissions Unit ID: **P032**

1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-05105, submitted on February 22, 2001.
2. Compliance with the visible particulate emissions limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

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>
T024 - 15,000 gallon fixed roof storage tank with scrubber	OAC rule 3745-31-05(A)(3)	0.02 TPY OC The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.
	40 CFR Part 60, Subpart Kb	See term C.1
	OAC rule 3745-21-07(D)	Exempt

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by emissions vented to a wet scrubber, use of submerged fill pipe and compliance with 40 CFR Part 60 Subpart Kb.
- 2.b The annual emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with this limit.
- 2.c 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.

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Rutge

PTI A

Issued: 6/19/2001

Emissions Unit ID: **T024**

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 source.

D. Reporting Requirements

1. Pursuant to the NSPS, the source owner/operator 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 163669
Columbus, Ohio 43216-3669

and

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

E. Testing Requirements

1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-05105, submitted on February 22, 2001.

F. Miscellaneous Requirements

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Rutgers Organics Corp
PTI Application: 14-05105
Issued

Facility ID: 1431111828

Emissions Unit ID: T024

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>
T025 - 15,000 gallon fixed roof storage tank with scrubber	OAC rule 3745-31-05(A)(3)	0.02 TPY OC The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.
	40 CFR Part 60, Subpart Kb	See term C.1
	OAC rule 3745-21-07(D)	Exempt

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by emissions vented to a wet scrubber, use of submerged fill pipe and compliance with 40 CFR Part 60 Subpart Kb.
- 2.b The annual emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with this limit.
- 2.c 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 source.

D. Reporting Requirements

1. Pursuant to the NSPS, the source owner/operator 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 163669
Columbus, Ohio 43216-3669

and

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

E. Testing Requirements

1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in

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PTI A

Issued: 6/19/2001

Emissions Unit ID: **T025**

PTI 14-05105, submitted on February 22, 2001.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 14-05105 Facility ID: 1431111828

FACILITY NAME Rutgers Organics Corp

FACILITY DESCRIPTION organic sulfonate crystals production facility CITY/TWP Ross

SIC CODE 2843 SCC CODE 3-01-202-01 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION silo storage of phenolsufonic acid

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	attainment	0.11	0.42	0.11	0.47
PM ₁₀	attainment	0.11	0.42	0.11	0.47
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

Emissions vented to fabric filter and visible emissions limitation.

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 containinants 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: 14-05105 Facility ID: 1431111828

FACILITY NAME Rutgers Organics Corp

FACILITY DESCRIPTION organic sulfonate crvstals production CITY/TWP Ross

Emissions Unit ID: T025

SIC CODE 2843 SCC CODE 3-01-202-01 EMISSIONS UNIT ID F002

EMISSIONS UNIT DESCRIPTION railcar loading

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	attainment	0.20	0.82	0.21	0.91
PM ₁₀	attainment	0.02	0.42	0.12	0.51
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP?

PSD?

OFFSET POLICY?

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

Use of a fabric filter to control particulate emissions from the railcar filling material separator and visible emissions limitation.

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 containinants 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: 14-05105 Facility ID: 1431111828

FACILITY NAME Rutgers Organics Corp

FACILITY DESCRIPTION organic sulfonate crvstals production CITY/TWP Ross

Emissions Unit ID: T025

SIC CODE 2843 SCC CODE 3-01-202-01 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION 2000 gallon reactor vessel with wet scrubber

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					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.03	0.11	0.03	0.12
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 60 subpart VV NESHAP? PSD? OFFSET POLICY?

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

Emissions vented to a wet scrubber.

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 containinants 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: **T025** _____

FACILITY DESCRIPTION organic sulfonate crystals production facility

CITY/TWP Ross

SIC CODE 2843 SCC CODE 3-01-202-01 EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION 2000 Gallon reactor vessel with wet scrubber

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	attainment	0.03	0.11	0.03	0.12
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **40 CFR Part 60**
subpart VV

NESHAP?

PSD?

OFFSET POLICY?

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

Emissions vented to a wet scrubber.

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 containinants 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: 14-05105 Facility ID: 1431111828

FACILITY NAME Rutgers Organics Corp

FACILITY DESCRIPTION organic sulfonate crvstals production CITY/TWP Ross

Emissions Unit ID: T025

SIC CODE 2843 SCC CODE 3-01-202-01 EMISSIONS UNIT ID P032

EMISSIONS UNIT DESCRIPTION steam tube dryer

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	attainment	0.31	1.22	0.31	1.35
PM ₁₀	attainment	0.03	0.12	0.03	0.13
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? PSD? OFFSET POLICY?

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

Emissions vented to a venturi scrubber and visible emissions limitation.

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 containinants 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: 14-05105 Facility ID: 1431111828

FACILITY NAME Rutgers Organics Corp

FACILITY DESCRIPTION organic sulfonate crvstals production CITY/TWP Ross

Emissions Unit ID: T025

SIC CODE 2843 SCC CODE 3-01-202-01 EMISSIONS UNIT ID T024

EMISSIONS UNIT DESCRIPTION 15000 gallon fixed roof storage tank

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	attainment		0.009		0.02
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 60

NESHAP?

PSD?

OFFSET POLICY?

subpart Kb

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

Emissions vented to wet scrubber, submerged fill pipe.

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 containinants 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:

34 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **T025**

FACILITY DESCRIPTION organic sulfonate crystals production
facility

CITY/TWP Ross

SIC CODE 2843 SCC CODE 3-01-202-01 EMISSIONS UNIT ID T025

EMISSIONS UNIT DESCRIPTION 15000 gallon fixed roof storage tank

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	attainment		0.009		0.02
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **40 CFR Part 60**
subpart Kb

NESHAP?

PSD?

OFFSET POLICY?

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

Emissions vented to wet scrubber, submerged fill pipe.

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 containinants 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: