



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
HAMILTON COUNTY**

**CERTIFIED MAIL**

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: 14-05423  
Fac ID: 1431361666**

**DATE: 2/1/2005**

Procter and Gamble Winton Hill Technical  
Leon James  
6083 Center Hill Avenue Mail Drop S1M12  
Cincinnati, OH 45224

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: USEPA

HCDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 2/1/2005  
Effective Date: 2/1/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-05423

Application Number: 14-05423  
Facility ID: 1431361666  
Permit Fee: **\$250**  
Name of Facility: Procter and Gamble Winton Hill Technical  
Person to Contact: Leon James  
Address: 6083 Center Hill Avenue Mail Drop S1M12  
Cincinnati, OH 45224

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**6083 Center Hill Avenue  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to P033 coffee roaster with afterburner.**

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

Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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

**Procter and Gamble Winton Hill Technical**  
**PTI Application: 14-05423**  
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**Facility ID: 1431361666**

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

**Procter and Gamble Winton Hill Technical**  
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permittee shall submit a complete operating permit application within ninety (90) 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 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>
PE	1.06
CO	1.80
NO <sub>x</sub>	1.14
SO <sub>2</sub>	0.79
VOC	0.74

Procter and Gamble Winton Hill Technical  
PTI Application: 14-05422  
Modif

Facility ID: 1431361666

Emissions Unit ID: P033

**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 3745-17-11(B)
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P033 - Coffee roaster with thermal afterburner - Modification OAC rule 3745-31-05(A)(3)

OAC rule 3745-18-06(E)

OAC rule 3745-17-07(A)(1)

Applicable Emissions  
Limitations/Control Measures

The emissions from this emissions unit shall not exceed the following limitations:

- PE/PM<sub>10</sub>: 0.20 lb/hr  
0.88 TPY
- CO: 0.34 lb/hr  
1.49 TPY
- NO<sub>x</sub>: 0.22 lb/hr  
0.96 TPY
- SO<sub>2</sub>: 0.15 lb/hr  
0.66 TPY
- VOC: 0.14 lb/hr  
0.61 TPY

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).

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

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

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 compliance with the emission limitations, the use of a thermal oxidizer and the visible particulate emissions limitation.
- 2.b** The hourly emissions 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**

- 1.** The average temperature of the exhaust gases of the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit.

**C. Monitoring and/or Record keeping Requirements**

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

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

- a.** All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases of the thermal oxidizer was less than 1400 degrees Fahrenheit.
  - b.** A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 2.** The permittee shall record the total operating time or production rate of the emissions unit on a monthly basis to determine actual emissions.

**D. Reporting Requirements**

- 1.** The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not

comply with the temperature limitation specified in term B.1. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

#### E. Testing Requirements

1. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitations:  
0.20 lb PE/PM<sub>10</sub>/hr and 0.88 TPY PE/PM<sub>10</sub>

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 2.48 lbs PE/PM<sub>10</sub>/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by the 85% efficiency rate of the oxidizer and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly PE/PM<sub>10</sub> emissions by the operating hours then by 1 Ton/2000 pounds.

3. Emission Limitations:  
0.34 lb CO/hr and 1.49 TPY CO

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 12.6 lbs CO/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by the 95% efficiency rate of the oxidizer and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly CO emissions by the operating hours then by 1 Ton/2000 pounds.

4. Emission Limitations:  
0.22 lb NO<sub>x</sub>/hr and 0.96 TPY NO<sub>x</sub>

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 0.4 lb NO<sub>x</sub>/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly NO<sub>x</sub> emissions by the operating hours then by 1 Ton/2000 pounds.

5. Emission Limitations:  
0.15 lb SO<sub>2</sub>/hr and 0.66 TPY SO<sub>2</sub>

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 0.27 lb SO<sub>2</sub>/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly SO<sub>2</sub> emissions by the operating hours then by 1 Ton/2000 pounds.

6. Emission Limitations:  
0.14 lb VOC/hr and 0.61 TPY VOC

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 5.04 lbs VOC/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by the 95% efficiency rate of the oxidizer and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly VOC emissions by the operating hours then by 1 Ton/2000 pounds.

## **F. Miscellaneous Requirements**

1. The terms and conditions in this Permit to Install supersede the terms and conditions in Permit to Install 14-05423 as issued on June 12, 2003.

**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>	
P034 - Coffee roaster with catalytic afterburner - Modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
		OAC rule 3745-18-06(C)
	OAC rule 3745-17-07(A)(1)	

**Procter****PTI A****Modification Issued: 2/1/2005**Emissions Unit ID: **P034**

Applicable Emissions  
Limitations/Control Measures

The emissions from this emissions unit shall not exceed the following limitations:

PE/PM<sub>10</sub>: 0.04 lb/hr  
0.18 TPY

CO: 0.07 lb/hr  
0.31 TPY

NO<sub>x</sub>: 0.04 lb/hr  
0.18 TPY

SO<sub>2</sub>: 0.03 lb/hr  
0.13 TPY

VOC: 0.03 lb/hr  
0.13 TPY

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).

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

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

**Exempt**

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, the use of a catalytic oxidizer and the visible particulate emissions limitation.
- 2.b** The hourly emissions 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**

- 1.** The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 700 degrees Fahrenheit.

**C. Monitoring and/or Record keeping Requirements**

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

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

- a.** All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 700 degrees Fahrenheit.
  - b.** A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 2.** The permittee shall record the total operating time or production rate of the emissions unit on a monthly basis to determine actual emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the catalytic oxidizer did not comply with the temperature limitation specified in term B.1. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

**E. Testing Requirements**

1. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
2. Emission Limitations:  
0.04 lb PE/PM<sub>10</sub>/hr and 0.18 TPY PE/PM<sub>10</sub>

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 2.48 lbs PE/PM<sub>10</sub>/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by the 85% efficiency rate of the oxidizer and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly PE/PM<sub>10</sub> emissions by the operating hours then by 1 Ton/2000 pounds.

3. Emission Limitations:  
0.07 lb CO/hr and 0.31 TPY CO

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 12.6 lbs CO/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by the 95% efficiency rate of the oxidizer and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly CO emissions by the operating hours then by 1 Ton/2000 pounds.

4. Emission Limitations:  
0.04 lb NO<sub>x</sub>/hr and 0.18 TPY NO<sub>x</sub>

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 0.4 lb NO<sub>x</sub>/ton of coffee (provided by facility stack test) by the batch size of the roaster and

then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly NO<sub>x</sub> emissions by the operating hours then by 1 Ton/2000 pounds.

5. Emission Limitations:  
0.03 lb SO<sub>2</sub>/hr and 0.13 TPY SO<sub>2</sub>

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 0.27 lb SO<sub>2</sub>/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly SO<sub>2</sub> emissions by the operating hours then by 1 Ton/2000 pounds.

6. Emission Limitations:  
0.03 lb VOC/hr and 0.13 TPY VOC

Applicable compliance method:

Compliance with the hourly emission limit may be determined by multiplying the emission factor of 5.04 lbs VOC/ton of coffee (provided by facility stack test) by the batch size of the roaster and then by the 95% efficiency rate of the afterburner and then by 1 Ton/2000 pounds.

Compliance with the annual emission limit may be determined by multiplying calculated hourly VOC emissions by the operating hours then by 1 Ton/2000 pounds.

## F. Miscellaneous Requirements

1. The terms and conditions in this Permit to Install supersede the terms and conditions in Permit to Install 14-05423 as issued on June 12, 2003.



**18 NEW SOURCE REVIEW FORM B**

PTI Number: 14-05423

Facility ID: 1431361666

FACILITY NAME Procter and Gamble Winton Hill Technical

FACILITY DESCRIPTION Administrative modification to P033 coffee CITY/TWP Cincinnati

Emissions Unit ID: **P034**

SIC CODE 2676

SCC CODE 30200204

EMISSIONS UNIT ID P034

EMISSIONS UNIT DESCRIPTION Coffee roaster with catalytic afterburner

DATE INSTALLED 06/03

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	Attainment	0.04 lb/hr	0.03	0.04 lb/hr	0.18
PM <sub>10</sub>	Attainment	0.04 lb/hr	0.03	0.04 lb/hr	0.18
Sulfur Dioxide	Attainment	0.03 lb/hr	0.02	0.03 lb/hr	0.13
Organic Compounds	Non-attainment	0.03 lb/hr	0.02	0.03 lb/hr	0.13
Nitrogen Oxides	Attainment	0.04 lb/hr	0.03	0.04 lb/hr	0.18
Carbon Monoxide	Attainment	0.07 lb/hr	0.05	0.07 lb/hr	0.31
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?**

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, the use of an oxidizer and the visible particulate 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 contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NOIDENTIFY THE AIR CONTAMINANTS: NA