OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Toward A Cleaner Environment
15 Year Anniversary 1972 - 1987

Richard F. Celeste
Governor

Re: Permit to Install
TUSCARAWAS County
Application No.Ø6-21Ø8

CERTIFIED MAIL

APRIL 6, 1988

BETZ LABORATORIES INC
JAMES LYNN
2117 REISER AVE SE
NEW PHILADELPHIA, OHIO 44662

Dear Sir:

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

TGR/gs

cc: US EPA
SOUTHEAST DISTRICT OFFICE

OhioEPA

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. Ø6-21Ø8
APS Premise No. Ø679Ø2Ø249
Permit Fee: $2ØØØ.

Name of Facility: BETZ LABORATORIES INC

Person to Contact: JAMES LYNN

Address: 2117 REISER AVE SE
NEW PHILADELPHIA, OHIO 44662

Location of proposed source(s): 2117 REISER AVE SE
NEW PHILADELPHIA, OHIO

Description of proposed source(s): POWDER & LIQUID BLENDING INCLUDING 6 STORAGE TANKS FOR RAW MATERIAL & WASTEWATER.

Date of Issuance: APRIL 6, 1988

Effective Date: APRIL 6, 1988

The above named entity is hereby granted a permit to install for the above described source(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 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 and specifications, the above described source(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

Richard L. Shank

Director

EPA 3156

Substantial construction for installation must take place within eighteen months of the effective date of this permit. This deadline may be extended by up to twelve 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.

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, examining records or reports pertaining to the construction, modification or installation of the above described source of environmental pollutants.

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.

The specified permit fee must be remitted within 15 days of the effective date of this permit to install.

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

EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for Betz Laboratories Inc. located in Tuscarawas County. The sources listed below shall not exceed the emission limits/control requirements contained in the following table:

Ohio EPA Source No.	Source Identification	BAT Determination	Applicable Ohio EPA rule	Allowable Emissions (lb/hr, lb/MMBTU, gr/DSCF,etc.)
P003	Liquids blending & storage tanks	*	3745-31-05 (A)(3)	0.02 lb/hr
P004	Powder blending	Scrubber of 98% efficiency	3745-31-05 (A)(3)	0.01 lb/hr

*Scrubber of 95% efficiency for the blending operation; submerged fill for storage tanks.

SUMMARY
TOTAL NEW SOURCE EMISSIONS

Pollutant	Tons/Year
Particulate (acid vapor)	0.42
Particulate (dust)	0.01

This condition in no way limits the applicability of any other state or federal regulation.

APPLICABILITY

This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

CONSTRUCTION STATUS

The Southeast District Office shall be notified in writing as to (a) the construction starting date (b) the construction completion date and (c) the date the facilities were placed into operation.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the sources.

REPORTING

Any reports required by the Permit to Install shall be submitted to Southeast District Office, 2195 Front St., Logan, Ohio 43138.

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.

MALFUNCTION/ABATEMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Southeast District Office. Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment, that requires the shutdown or bypassing of said equipment, must be accompanied by the shutdown of the associated air pollution sources.

STORAGE TANKS FOR PETROLEUM LIQUIDS, ETC. REQUIRED TO HAVE SUBMERGED FILL ONLY

Best Available Technology for this source consists of the use of submerged fill into the storage tanks. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

CENTRAL OFFICE USE ONLY

Issuance Date: _____

Effective Date: _____

APS Premise No. 0679020249

PTI Application No. 06-2108

Fee $2,000

PERMIT TO INSTALL WORKSHEET

1. TYPE OF SOURCE: Check as applicable:

X AIR - Major Source? ___YES X NO - Was a New Source Review Data Sheet (for modeling) submitted to APC for this source? ___YES X NO

___ NSPS Category_____ ___ PSD ___ CEM ___ NESHAPS Category_____ ___Emission Offsets

___ WATER - Pertains to ___ Sewers ___ Wastewater Treatment ___Industrial Facility

___ SOLID WASTE

___ HAZARDOUS WASTE DISPOSAL FACILITY - Is a HWFAB Permit required? ___YES ___NO

2. Check one: X APPROVAL _____DENIAL

3. FACILITY NAME: Betz Laboratories, Inc.

4. APPLICANT/PERSON TO CONTACT James Lynn PHONE (215) 355-3300

5. MAILING ADDRESS: (Street) 2117 Reiser Ave. S.E.

(City) New Philadelphia (State) OH (Zip) 44662

6. LOCATION OF PROPOSED SOURCE: Always complete b (city or township) and c (county).

a. Street Address or Location Description 2117 Reiser Ave. S.E.

b. City/~~Township~~ New Philadelphia

c. County/~~Counties~~ Tuscarawas

d. Sewer District, if applicable _____

7. DESCRIPTION OF PROPOSED SOURCE (Max. 120 characters)

POWDER BLENDING AND LIQUID BLENDING INCL
UDING SIX STORAGE TANKS FOR RAW MATERIAL
S AND WASTEWATER

8. DATE COMPLETE APPLICATION RECEIVED: 2/18/88

EPA 3151
6/1/83

9. CONSTRUCTION STATUS: ___ Unknown ___ Not started X Partially Completed ___Completed

10. DATE CONSTRUCTION TO BEGIN: 1/88

11. ESTIMATED COST OF WASTE TREATMENT FACILITY PROJECT: _____

NOTE: ATTACH INSTALLATION SCHEDULE TO THIS WORKSHEET FOR AIR POLLUTION SOURCES.

12. DO/LAA Engr. Review By: Glen GG Greenwood Date 2/25/88

13. Review approved: [signature] Date 2/26/88

14. D.O. Review as Required: Bob Cattrell Date 3-1-88

15. Central Office Review: _____ Date _____

16. For any Combined Permits:

AIR REVIEW (DO/LAA) _____ Date _____

WASTEWATER REVIEW _____ Date _____

SOLID WASTE REVIEW _____ Date _____

HAZARDOUS WASTE REVIEW _____ Date _____

FOR DENIALS ONLY

RULES IN VIOLATION: _____

SPECIFIC REASONS FOR DENIAL: _____

PERMIT TO INSTALL DISTRIBUTION SHEET
INDICATE BELOW TO WHOM COPIES ARE TO BE SENT

Applicant's Mailing Address	PERMIT	REPORT	PLANS	DATA SHEETS
James Lynn PERSON TO CONTACT Betz Laboratories, Inc. APPLICANT 2117 Reiser Ave. S.E. STREET New Philadelphia OH 44662 CITY STATE ZIP	X			
Copy to:	X			
Copy To:	X			
Copy To:	X			
Copy To:	X			
Local Air Agency _____	X			
District Office NEDO ___ NWDO ___ CDO ___ SEDO X SWDO ___	X			
Central Office DAPC ___ DWPC ___ DLPC ____ DHMM _____	X			

Permit to Install - Standard Terms and Conditions

Select and circle the appropriate standard terms and conditions. Terms and conditions requiring supplemental information do not have to be typed as long as the handwriting is legible. Illegible handwritten terms and conditions will be returned. Please note instructions concerning conditions 1, 2, and 3. If necessary, you may attach additional terms and conditions to these condition sheets. These special terms and conditions must be typed.

Select 1 if the source has not begun any construction.

1. The proposed source shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

Select 2 if the source has begun construction or completed construction.

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

Number 3 must be completed in full.

EMISSION SUMMARY

3. The air contaminant sources listed below comprise the Permit to Install for Betz Laboratories located in Tuscarawas County. The sources listed below shall not exceed the emission limits/control requirements contained in the following table:

Ohio EPA Source No.	Source Identification	BAT Determination	Applicable Ohio EPA rule	Allowable Emissions (lb/hr, lb/MMBTU, gr/DSCF,etc.)
P003	Liquids Blending & Storage Tanks	Scrubber of 95% efficiency for the blending operation; submerged fill for storage tanks.	3745-31-05 (A)(3)	0.02 #/hr.
P004	Power Blending	Scrubber of 98% efficiency	3745-31-05 (A)(3)	0.01 #/hr.

SUMMARY
TOTAL NEW SOURCE EMISSIONS

Pollutant	Tons/Year
Particulate (acid vapor)	0.42
Particulate (dust)	0.01

This condition in no way limits the applicability of any other state or federal regulation.

APPLICABILITY

4. This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

CONSTRUCTION STATUS

5. The (appropriate District Office of the Ohio EPA or Local Air Pollution Control Agency) shall be notified in writing as to (a) the construction starting date (b) the construction completion date and (c) the date the facilities were placed into operation. (DO NOT use in conjunction with Condition Number 6 or 7 unless multiple schedules are needed).

NSPS REQUIREMENTS

6. The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

Source No.	Source Description	NSPS Regulation (Subpart)

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 60 are also federal enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 prior to such date);
3. Actual start-up date (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
Authorization and Compliance Unit
P.O. Box 1049
Columbus, Ohio 43215-1049

and (_____)
insert correct field office

NESHAPS REQUIREMENTS

7. The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

Source No.	Source Description	NESHAPS Regulation

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAPS, the source owner/operator is required to report the following milestones;

1. Date of commencement of construction (no later than 30 days after such date);
2. Anticpated date of initial start-up (not more than 60 days or less than 30 prior to such date);
3. Actual date of initial start-up (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
Division of Air Pollution Control
Authorization and Compliance Unit
P. O. Box 1049
Columbus, Ohio 43216-1049

and (_____)
insert correct field office

PERFORMANCE TEST REQUIREMENTS

8. The permitee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director or an Ohio EPA representative shall be allowed to witness the tests, examine testing equipment and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

   A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made thirty (30) days in advance and shall specify the source operating parameters, the proposed test procedures and the time, date, place and person(s) conducting such tests.

   B. Two copies of the test results shall be submitted within thirty (30) days after the completion of the performance test.

   C. (Optional) Tests shall be performed for the following sources and pollutants:

MONITORING REQUIREMENTS

9. A _____ monitor shall be installed on the _____. The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR Part 60 - Standards of Performance for New Stationary Sources.

   Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704.03 (I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 1. Personnel from the Ohio EPA field office shall be permitted to witness the performance specification test, and 2 copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

Pursuant to 40 CFR parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07 or any limitations specified in the terms and conditions of this permit. These quarterly excess emission reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

WASTE DISPOSAL

10. The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the sources.

REPORTING

11. Any reports required by the Permit to Install shall be submitted to (SEDO).
insert field office

PSD REQUIREMENTS

12. The source described in this Permit to Install is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the U.S. Environmental Protection Agency 40 CFR 51.21. The authority to apply and enforce the PSD regulations has been delegated to the Ohio Environmental Protection Agency. The terms and conditions of this permit and the requirements of the PSD regulations are also enforceable by the U.S. Environmental Protection Agency.

PERMIT TO OPERATE APPLICATION

13. A Permit to Operate Application and a $15 application fee must be submitted to the appropriate field office for each source in this Permit to Install. In accordance with OAC rule 3745-35-02, the application shall be made at least ninety days prior to start-up of the source.

PUBLIC DISCLOSURE

14. 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.

MALFUNCTION/ABATEMENT

15. This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

16. In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the (SEDO). Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment, that requires the shutdown or bypassing of said equipment, must be accompanied by the shutdown of the associated air pollution sources.

insert field office

GASOLINE DISPENSING FACILITIES (WITH STAGE I)

17. Best Available Technology for this source consists of the use of Stage I vapor balance system. The vapor balance system shall be designed and operated to route at least 90% by weight of the organic compounds in the displaced vapors from the storage tanks to the delivery vessel and shall be equipped with a means to prevent the discharge into the atmosphere of displaced vapors from an unconnected vapor line. This shall be used at all times when filling the tanks.

The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

This facility shall be serviced by a bulk gasoline plant or terminal that is in compliance with OAC Rule 3745-21-09(P) or (Q), respectively.

There shall be no leaks in the vapor and liquid lines during the transfer of gasoline.

All fill caps shall be "in place" and clamped during normal storage conditions.

The gasoline dispensing facility shall repair within fifteen (15) days any leaks from the vapor balance system which is employed to meet the requirements of Paragraph (A)(3) of OAC Rule 3745-31-05 or Paragraph (R)(1) of OAC Rule 3745-21-09 when such leaks are equal to or greater than 100% of the lower explosive limit of propane, as determined under Paragraph (J) of OAC Rule 3745-21-10.

STORAGE TANKS FOR PETROLEUM LIQUIDS, ETC. REQUIRED TO HAVE SUBMERGED FILL ONLY

18. Best Available Technology for this source consists of the use of submerged fill into the storage tanks. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

ENGINEERING REVIEW FORM

for PTO Renewals and First Issues
Process Sources (with Stack Discharges)

Section 1 (General Data):

(a) Facility Name: Betz
(b) Source Application No: 06790202449 F004
(c) Source Description: powder blending
(d) Year Installed: 1988

* * * * * * * * * * * * *

Section 2 (Process Equipment Data):

(a) Maximum process weight rate: 50 tons/hr
(b) Uncontrolled mass rate of emission (UMRE) at max. PWR: .5 lb/hr
(c) Basis for (2)(b) [e.g., stack test, published emission factor, material balance, etc.]: 0.01 #/ton is a conservative guess based on RACM for clay handling + storage

(d) Is this process unit physically or operationally united with other process units at the facility? No (yes or no)
(e) If the answer to (2)(d) is yes, list all such units (including this unit) in the following and complete the requested data:

OEPA Source No.	Type of Control Equipment	UMRE at Max. PWR (lb/hr)	UMRE to be included in Grouping (lb/hr)

(f) Total UMRE used to calculate allowable emission rate from Figure II in OAC 3745-17-11: 0.5 lb/hr

* * * * * * * * * * * * *

Section 3 (Emissions Data):

(a) Uncontrolled Emission Rates:

(1) Contaminant	(2) Emission Factor (lb/unit)	(3) Basis For Emission Factor	(4) Max PWR or Max Prod. Rate(unit/hr)	(5) Uncontrolled Rate from Emission Factors [(2)x(4)] or Stack Tests (lb/hr)
Particulate	0.5	see 2(c)		0.5
SO_2				

(b) Actual (Controlled) Emission Rates:

(1) Contaminant	(2) Emission Factor (lb/unit)	(3) Basis for Emission Factor	(4) Max. PWR or Max. Prod. Rate(unit/hr)	(5) 1-% Control Eff. / 100	(6) Actual Rate from Emission Factors [(2)x(4)x(5)] or Stack Tests (lb/hr)
Particulate	0.5 #/hr	see 2(c)		0.01	0.005 #/hr
SO_2					
NO_x					
CO					
HC					

(c) Allowable Emission Rates:

(1) Contaminant	Applicable Law/Regulation (State/Federal/Local)	Allowable Rate (lb/hr)
Particulate	3745-31-05(A)(3) 98% eff = 0.01 #/hr	Table I NA, Figure II NA
SO_2		
NO_x		
CO		
HC		

(d) Summary of Stack Test Data Used in Determination of an Emission Factor in (3)(a)(2) and/or (3)(b)(2) or in Determination of an Uncontrolled Rate in (3)(a)(5) and/or an Actual Rate in (3)(b)(6):

Stack Test Date	Controlled or Uncontrolled	Pollutants Tested	Max. PWR or Max. Prod. Rate During Test (lb/ Unit)	Test Witnessed by Ohio EPA? (Yes/No)	Test Method(s) Used

* * * * * * * * * * * *

Section 4 (EAP Analysis):

(a) Actual Emission Rates (Tons/Day):

(1) Contaminant	(2) Emission Factor (lb/unit)	(3) Max. PWR or Max. Prod. Rate (unit/day)	(4) Conversion Factor (tons/lb)	(5) Actual Emission Rate [(2)x(3)x(4)] (tons/day)
Particulate	0.005 #/hr	24 hr/day	.0005	.00006
SO_2			.0005	
NO_x			.0005	
CO			.0005	
HC			.0005	

(b) If an actual emission rate in (4)(a)(5) for any air contaminant exceeds 0.25 tons/day, list each of those contaminants below and indicate whether an EAP was submitted to OEPA:

Pollutant(s) > 0.25 Tons/Day	EAP Submitted? (Yes/No)
NA	

* * * * * * * * * * * * *

Section 5 (Major Source Determination for EIS and Registration Status):

(a) Annual (Uncontrolled) Emission Rates:

(1) Contaminant		(2) Emission Factor (lb/unit)	(3) Max. PWR or Max. Prod. Rate (unit/yr)	(4) Conversion Factor (tons/lb)	(5) Annual (Uncontrolled) Emission Rate [(2)x(3)x(4)] (tons/yr)
Particulate		.01 #/Ton	1250 Ton/yr	.0005	.00625 TPY
~~SO_2~~				.0005	
~~NO_x~~	MAX	0.5 #/hr	8760 hr/yr	.0005	2.19 TPY
~~CO~~				.0005	
~~HC~~				.0005	

(b) If an emission rate in (5)(a)(5) for any air contaminant exceeds 25 tons/year, list each of those contaminants below and indicate whether an EIS Point Source Report has been submitted to OEPA for the previous year(s) of record:

Major Source Pollutant(s)	Previous Year(s) that EIS Point Source Report was Submitted

* * * * * * * * * * * * * *

Section 6 (Visible Emission Analysis):

(a) Indicate the status of compliance with Rule 3745-17-07 [yes (in compliance)/no (out of compliance)]: yes

(b) List the last date that VE readings were performed and their results as follows:

Date	Hour	Total No. of Six Minute Averages Exceeding 20% Opacity in the Hour	Total No. of Six Minute Averages Exceeding 60% in the hour	Six Minute Average Opacity Range in the hour (%)

* * * * * * * * * * * * * *

Section 7 (Permit Recommendation):

(a) Is this source in compliance with applicable laws/regulations based on the analysis in Sections (2), (3) and (4): yes (yes/no)

(b) What is your permit recommendation? FTI / Reg (PTO/Registration/Variance, Approval/Denial)

Glen Greenwood
Name of Individual Completing Form

2-23-88
Date of Completion of this Review

ENGINEERING REVIEW FORM

for PTO Renewals and First Issues
Process Sources (with Stack Discharges)

Section 1 (General Data):

(a) Facility Name: Betz
(b) Source Application No: 0679020249 F003
(c) Source Description: Liquid blending
(d) Year Installed: 1988

* * * * * * * * * * * * *

Section 2 (Process Equipment Data):

(a) Maximum process weight rate: 75 tons/hr
(b) Uncontrolled mass rate of emission (UMRE) at max. PWR: 0.4 lb/hr
(c) Basis for (2)(b) [e.g., stack test, published emission factor, material balance, etc.]: Working loss for most volatile of acids (HF) is 60#/yr. ∴ a conservative estimate of uncontrolled emissions is 200#/yr ≈ 0.1#/hr avg. Max. = 4 x avg. = 0.4#/hr
(d) Is this process unit physically or operationally united with other process units at the facility? NO (yes or no)
(e) If the answer to (2)(d) is yes, list all such units (including this unit) in the following and complete the requested data:

OEPA Source No.	Type of Control Equipment	UMRE at Max. PWR (lb/hr)	UMRE to be included in Grouping (lb/hr)

(f) Total UMRE used to calculate allowable emission rate from Figure II in OAC 3745-17-11: 0.4 lb/hr

* * * * * * * * * * * * *

Section 3 (Emissions Data):

(a) Uncontrolled Emission Rates:

(1) Contaminant	(2) Emission Factor (lb/unit)	(3) Basis For Emission Factor	(4) Max PWR or Max Prod. Rate(unit/hr)	(5) Uncontrolled Rate from Emission Factors [(2)x(4)] or Stack Tests (lb/hr)
Particulate	0.4 #/hr	see 3(c)		0.4 #/hr
SO_2				

(b) Actual (Controlled) Emission Rates:

(1) Contaminant	(2) Emission Factor (lb/unit)	(3) Basis for Emission Factor	(4) Max. PWR or Max. Prod. Rate(unit/hr)	(5) 1-% Control Eff. / 100	(6) Actual Rate from Emission Factors [(2)x(4)x(5)] or Stack Tests (lb/hr)
Particulate	0.4 #/hr	see 3(c)		.01	0.004 #/hr
SO_2					
NO_x					
CO					
HC					

(c) Allowable Emission Rates:

(1) Contaminant	Applicable Law/Regulation (State/Federal/Local)	Allowable Rate (lb/hr)
Particulate	3745-31-05 (A)(3)	0.02 #/hr (95% control) Table I NA, Figure II NA
SO_2		
NO_x		
CO		
HC		

(d) Summary of Stack Test Data Used in Determination of an Emission Factor in (3)(a)(2) and/or (3)(b)(2) or in Determination of an Uncontrolled Rate in (3)(a)(5) and/or an Actual Rate in (3)(b)(6):

Stack Test Date	Controlled or Uncontrolled	Pollutants Tested	Max. PWR or Max. Prod. Rate During Test (lb/ Unit)	Test Witnessed by Ohio EPA? (Yes/No)	Test Method(s) Used

* * * * * * * * * * * *

Section 4 (EAP Analysis):

(a) Actual Emission Rates (Tons/Day):

(1) Contaminant	(2) Emission Factor (lb/unit)	(3) Max. PWR or Max. Prod. Rate (unit/day)	(4) Conversion Factor (tons/lb)	(5) Actual Emission Rate [(2)x(3)x(4)] (tons/day)
Particulate	0.004 #/hr	24 hr/day	.0005	0.000048
SO_2			.0005	
NO_x			.0005	
CO			.0005	
HC			.0005	

(b) If an actual emission rate in (4)(a)(5) for any air contaminant exceeds 0.25 tons/day, list each of those contaminants below and indicate whether an EAP was submitted to OEPA:

Pollutant(s) > 0.25 Tons/Day	EAP Submitted? (Yes/No)
NA	

* * * * * * * * * * * * *

Section 5 (Major Source Determination for EIS and Registration Status):

(a) Annual (Uncontrolled) Emission Rates:

(1) Contaminant	(2) Emission Factor (lb/unit)	(3) Max. PWR or Max. Prod. Rate (unit/yr)	(4) Conversion Factor (tons/lb)	(5) Annual (Uncontrolled) Emission Rate [(2)x(3)x(4)] (tons/yr)
Particulate	.4 #/hr	2080 hr/yr	.0005	.416
~~SO_2~~		8760	.0005	1.75
~~NO_x~~			.0005	
~~CO~~			.0005	
~~HC~~			.0005	

(b) If an emission rate in (5)(a)(5) for any air contaminant exceeds 25 tons/year, list each of those contaminants below and indicate whether an EIS Point Source Report has been submitted to OEPA for the previous year(s) of record:

Major Source Pollutant(s)	Previous Year(s) that EIS Point Source Report was Submitted

* * * * * * * * * * * * *

Section 6 (Visible Emission Analysis):

(a) Indicate the status of compliance with Rule 3745-17-07 [yes (in compliance)/no (out of compliance)]: Yes

(b) List the last date that VE readings were performed and their results as follows:

Date	Hour	Total No. of Six Minute Averages Exceeding 20% Opacity in the Hour	Total No. of Six Minute Averages Exceeding 60% in the hour	Six Minute Average Opacity Range in the hour (%)

* * * * * * * * * * * * * * *

Section 7 (Permit Recommendation):

(a) Is this source in compliance with applicable laws/regulations based on the analysis in Sections (2), (3) and (4): Yes (yes/no)

(b) What is your permit recommendation? PTI/Reg. (PTO/Registration/Variance, Approval/Denial)

Glen Greenwood
Name of Individual Completing Form

2-23-88
Date of Completion of this Review

NEW SOURCE REVIEW

FORM B
(REVISED 5/20/85)

I NUMBER 06-2108

DATE COMPLETE APPLICATION RECEIVED 2-18-88

EMISE NUMBER 0679020249

CILITY NAME Fetz Laboratories

START-UP DATE 4-88

TY (OR TOWNSHIP) New Philadelphia

COUNTY Tuscarawas

CILITY DESCRIPTION (INCLUDE SIC CODE) 2899 chemical blending facility

URCE DESCRIPTION (INCLUDE SCC) chemical blending - no scc found

ISSIONS: (ATTACH CALCULATIONS)

LLUTANT	ACTUAL EMISSIONS (TONS/YEAR)	PERMIT ALLOWABLE EMISSIONS (TONS/YEAR)	PERMIT ALLOWABLE EMISSIONS RATE (LB./MMBTU GR./DSCFR., ETC.)
RTICULATE EMISSIONS	0.43	3.94	0.01 + 0.02 #/hr
LFUR DIOXIDE			
ANIC COMPOUNDS			
TROGEN DIOXIDE			
ARBON MONOXIDE			
EAD			
THER*			

HECK ALL APPLICABLE REQUIREMENTS FOR THIS SOURCE: __NESHAPS __NSPS __PSD __EMISSION OFF
✓NONE POLICY

AS A BACT/LAER CLEARINGHOUSE FORM BEEN COMPLETED FOR THIS SOURCE? __YES ✓NO
F YES, ATTACH A COPY OF THE FORM. HAS A COPY BEEN SENT TO U.S. EPA? __YES __NO

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

Liquids blending - 95% efficient scrubber for acid vapor control

Powder blending - 98% efficient scrubber for dust control

PTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

PERSON COMPLETING FORM Glen Greenwood DATE 2-23-88

*Includes any emissions of toxic air pollutants.
See other side for List of 31 Toxic Air
Contaminants.

For Office Use Only
Check Appropriate Box(es)

___ Air Discharge

___ Water Discharge to New Source Treatment Works

___ Solid Waste Disposal Facility

___ Hazardous Waste Disposal Facility

For Office Use Only

PTI Application No. 06-2108

Date Received Feb 16, 1988

Premise No. _____

PAID
Amount 30.00 Date 2/18/88
Check # 708746 Date 2/5/88

OHIO ENVIRONMENTAL PROTECTION AGENCY
Application for Permit to Install

Betz Laboratories, Inc.
Applicant's Name

2117 Reiser Ave. S.E.
Mailing Address

New Philadelphia	Tuscarawas	OH	44662	216/339-2292
City	County	State	Zip Code	Telephone Number

James Lynn Project Manager 215/355-3300
Person to contact (Name and Title and Telephone Number)

The source will be constructed on the existing Betz site - the corner
Location of Proposed Facility (State the location as completely and precisely as possible)*

of Reiser Ave. S.E. and Rt. 259.

New Philadelphia	Tuscarawas	44662
City or Township	County	Zip Code

2899
Standard Industrial Classification Code

Directions: A Permit to Install is required for new or modified source of pollution under the provisions of OAC Rule 3745-31. An application cannot be considered complete unless all applicable questions are answered and the required information has been submitted. This application must be signed in accordance with OAC Rule 3745-31-04(B) or it cannot be accepted.

Applicants for permits involving air emissions or wastewater treatment facilities will be required to pay a permit to install fee as shown in Section 3745.11(B) and (C) of the Ohio Revised Code. This fee is payable fifteen days after the date of final issuance of the permit.

Name of new or modified source or facility: Betz Laboratories, Inc.

Product of new or modified source/facility: Water Treatment Chemicals

Will the proposed source/facility involve any of the following: Check all that apply.

A. X Air Discharge
B. ___ Wastewater Treatment Works
C. ___ Solid Waste Disposal Facility
D. ___ Hazardous Waste Disposal Facility

*Example: "The source will be constructed on a 20 Acre plot to be located on Franklin Township Road No. 17, approximately 1¼ miles north of the intersection of State Route 99 and Franklin Township Road No. 17."

EPA-3150

Under OAC 3745-31-04, These signatures shall constitute personal affirmation that all statements or assertions of fact made in the application are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.

2/15/88

Authorized Signature (for facility) Date

J. R. Marquiss

Vice-President Production

Title

4636 Somerton Road
Trevose, PA 19047

Address

For Wastewater Treatment Plants:

Signature of General Contractor or Agent Performing installation, if selected. Date

Company

Address

TO: Dave Schuetz

Need P.T.I cover

FROM: Brenda Wadsworth

SUBJECT: Information from Incoming PTI Applications.

PTI NO.: 06-2108

Date Received: Feb 16, 1988

Facility Name: Betz Laboratories, Inc

Location: 2117 Reiser Ave, S.E. New Philadelphia

Project: Packed Column Scrubber + Storage Tanks

Type: Wastewater, Air or Solid Waste

Should your division be included in this project:
yes or no by: S. Rine
(Your name here)

Return this form to: Glen Greenwood by 2/23/88

TO: Steve Hamlin

FROM: Brenda Wadsworth

SUBJECT: Information from Incoming PTI Applications.

PTI NO.: 06-2108

Date Received: Feb 16, 1988

Facility Name: Betz Laboratories, Inc

Location: 2117 Reiser Ave, S.E.

Project: Packed Column Scrubber + Storage Tanks

Type: Wastewater, Air or Solid Waste DS Hum: include ST + Cs

Should your division be included in this project:
yes or no by:

-BB