Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

10/5/2015

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Michael Resar
PCS Nitrogen Ohio, L.P.
2200 Fort Amanda Road
Lima, OH 45804

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0302020370
Permit Number: P0119326
Permit Type: Administrative Modification
County: Allen

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Indiana

FINAL

Division of Air Pollution Control
Permit-to-Install
for
PCS Nitrogen Ohio, L.P.

Facility ID:	0302020370
Permit Number:	P0119326
Permit Type:	Administrative Modification
Issued:	10/5/2015
Effective:	10/5/2015

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
PCS Nitrogen Ohio, L.P.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 8
9. Reporting Requirements 8
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 10
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. P523, NH3 Unit – Carbon Dioxide (CO_2) Stripper 14

Authorization

Facility ID:	0302020370
Facility Description:	Nitrogenous Fertilizers
Application Number(s):	A0053830
Permit Number:	P0119326
Permit Description:	This is an administrative modification to permit an alternative operating scenario for the medium pressure condensate stripper (MPCS) which is utilized to recover the product in the Ammonia Unit- CO2 stripper section (P523). The alternative operating scenario is being requested to operate without the MPCS for a limited time each year.
Permit Type:	Administrative Modification
Permit Fee:	$625.00
Issue Date:	10/5/2015
Effective Date:	10/5/2015

This document constitutes issuance to:

PCS Nitrogen Ohio, L.P.
Fort Amanda &Adgate Roads
None
Lima, OH 45804

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119326
Permit Description: This is an administrative modification to permit an alternative operating scenario for the medium pressure condensate stripper (MPCS) which is utilized to recover the product in the Ammonia Unit- CO2 stripper section (P523). The alternative operating scenario is being requested to operate without the MPCS for a limited time each year.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P523**
Company Equipment ID:	NH3 Unit - CO2 Stripper
Superseded Permit Number:	P0117742
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) 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.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theOhio EPA DAPC, Northwest District Officein accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

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 state-only required 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 Ohio EPA DAPC, Northwest District Office. 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, 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.)

10. 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)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services"facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The permittee shall maintain the following records for emissions units B502, B503, B507, B509, B510, J001, J002, P520, P521, P522, P523, P526, P529, P554, P555, P563, P564, T518, T537, T551, T622, T623, T624 and T625 as described in Permit to Install application No. A0047234 submitted on July 10, 2013 and Permit to Install application No. A0053830 submitted on August 4, 2015 in order to demonstrate that the ammonia and urea units expansion project does not trigger a major modification for PM2.5, NOx, CO and/or VOC:

   a. the projected actual annual emissions for PM2.5, NOx, CO and VOC, in tons per year, from the ammonia and urea units' expansion project as submitted in Permit to Install application No. A0047234 submitted on July 10, 2013 and Permit to Install application No. A0053830 submitted on August 4, 2015; and

   b. the total actual annual emissions for PM2.5, NOx, CO and VOC, in tons per year, from emissions units B502, B503, B507, B509, B510, J001, J002, P520, P521, P522, P523, P526, P529, P554, P555, P563, P564, T518, T537, T551, T622, T623, T624 and T625, combined, for ten calendar years after commencing operation of the ammonia and urea units expansion project.

3. The permittee shall notify the Northwest District Office in writing if annual emissions from all emissions units in the ammonia and urea expansion project, as specified in facility-wide term and condition B.2.b., result in a significant PM2.5, NOx, CO and/or VOC emissions increase and exceed the projected actual PM2.5, NOx, CO and/or VOC emissions contained in the Permit to Install application No. A0047234, submitted on July 10, 2013 and Permit to Install application No. A0053830 submitted on August 4, 2015. This notification shall identify the cause for the significant emissions increase and the estimated PM2.5, NOx, CO and/or VOC emissions. This notification shall be submitted to the Northwest District Office within 120 days after the end of such year.

4. This PTI addresses a modification of facility operations associated with an ammonia and urea expansion project to produce more ammonia to be used for: 1) additional shipment of anhydrous ammonia offsite to other PCS facilities and/or customers, and 2) additional urea synthesis to produce more urea solutions, such as diesel exhaust fluid (DEF) for additional shipment offsite to customers. The requirements of this permit shall become enforceable on the date the permittee commences operation under the modification authorized by this permit. Identification of the specific date modified operation commences is required by term A.13.b) within the Standard Terms and Conditions of this permit. Authorization and permitting requirements associated with the current operation (prior to modification) of emissions units B503, B507, J001, P520, P521, P522, P523*, P526, P563, and P564 are contained in the facility's Title V permit and are incorporated by reference (IBR) as requirements of this permit as indicated by the following:

   a) The permittee shall comply with all applicable emission limitations/control measures, operational restrictions, monitoring and record keeping requirements, reporting requirements, testing requirements, and additional term and condition requirements contained in the facility's Final Title V Chapter 3745-77 permit with an issuance and effective date of 02/27/13. The IBR requirements shall cease to be enforceable for each emissions unit after the date an emissions unit commences operation under the modification authorized by this permit as indicated above.

C. Emissions Unit Terms and Conditions

1. P523, NH3 Unit – Carbon Dioxide (CO_2) Stripper

Operations, Property and/or Equipment Description:

Ammonia Production Unit – CO_2 Stripper Section

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)e. and d)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	1.03 lbs of carbon monoxide (CO)/hr and 4.50 tons of CO/yr 194.04 lbs of volatile organic compounds (VOC)/hr and 242.38 tons of VOC per rolling, 12-month period See b)(2)b., b)(2)c., c)(1) and c)(2)
b.	ORC 3704.03(T)	See b)(2)d.
c.	OAC rule 3745-31-05(A)(3), as effective 06/30/2008	See b)(2)e. and b)(2)f.
d.	OAC rule 3745-31-05(A)(3), as effective 06/30/2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO emissions from this air contaminant source since the potential to emit is less than 10 tons per year taking into account the federally enforceable restriction in b)(1)a. above. See b)(2)g.
e.	ORC 3704.03(F) and OAC rule 3745-114	See d)(1)

(2) Additional Terms and Conditions

a. The Medium Pressure Condensate Stripper (MPCS) associated with this emissions unit is integral to the process equipment as a product recovery device. Thus, there is no parametric monitoring necessary.

b. The mass emission rate limitations for CO and for the hourly VOC limitation in b)(1)a. above represent the potentials to emit (PTE), defined as the maximum capacity to emit an air pollutant under the physical and operational design. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations. See f)(1)a. and b., for details regarding the PTE.

c. This permit establishes the following federally enforceable emission limitations for the purpose of representing the potentials to emit for this emissions unit. The federally enforceable limitations are based on the operational restrictions in c)(1) and c)(2):

i. 1.03 lbs of CO/hr and 4.50 tons of CO/yr; and

ii. 194.04 lbs of VOC/hr and 242.38 tons of VOC per rolling, 12-month period.

d. BAT requirements for VOC emissions under ORC 3704.03(T) have been determined to be compliance with the annual VOC emission limitation as established pursuant to OAC rule 3745-31-05(D).

e. BAT requirements under OAC rule 3745-31-05(A)(3), as effective June 30, 2008 has been determined to be the following federally enforceable emission limitation established pursuant to OAC rule 3745-31-05(D):

i. 4.50 tons CO/yr.

f. The Best Available Technology (BAT) emission limit contained in b)(2)e. above applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

It should be noted that the requirements of b)(2)e. above established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

g. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP.

c) Operational Restrictions

(1) Emissions fromnormal operations and redcued “MPCS” efficiency for the ammonia unit – CO2 stripper section are limited by the following:

12

$$\sum_{M=1} \sum_{n} VOC_n \leq 242.38$$

where:

M = the increment of the rolling 12-month period;

n = type of operation (i.e. normal and reducedMPCS efficiency) during the period;

CO_n = calculated emissions of carbon monoxide in tons;

VOC_n = calculated emissions of volatile organic compounds in tons;

(2) To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, emissions from normal operations and reduced MPCS efficiency for the ammonia unit – CO2 stripper section are limited by the following:

Allowable Operation Limitations

Month(s)	$\sum_{n} VOC_n \leq$
1-1	50.00
1-2	100.00
1-3	150.00
1-4	200.00
1-12	242.38

After the first 12 calendar months of operation under the provisions of this permit, compliance with the allowable operation limitations shall be based upon a rolling 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

a. Type and time period of each operation (normal operations and reduced MPCS efficiency);

b. The calculated VOC emissions, in tons, associated with each type of operation, based on a detailed review of normal operations and reduced MPCS efficiency.

c. The total VOC emission rates, in tons, from all operation types [summation of d)(1)b. for normal operations and reduced MPCS efficiency];

d. For the first 12 calendar months of operation under the provisions of this permit, the cumulative monthly VOC emissions, in tons; and

e. After the first 12 months of operation under the provisions of this permit, the rolling 12-month VOC emissions, in tons.

(2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary for this permit action because actual emissions of the toxic air contaminant ammonia (NH3), as specified in OAC rule 3745-114-01, resulted in an actual decrease. Other than NH3, the maximum annual emissions for each toxic air contaminant (as specified in OAC rule 3745-114-01) that is not subject to MACT and/or NESHAP regulations will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) 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, etc. that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all exceedances of the rolling 12-month operational restriction specified in c)(1); and

b. all exceedances of the allowable operational limitations for the first 12 months of operation as specified in c)(2);

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

1.03 lbs of CO/hr and 4.50 tons of CO/yr

Applicable Compliance Method:

The hourly CO emission limitation above was developed by multiplying an adjusted CO emission factor from AP-42, Table 8.1-1 (dated 7/93) (0.0105 lb/ton of ammonia, which was adjusted from PCS Engineering staff system knowledge, a detailed review of operations history, and process chemistry and conversion data) by the maximum ammonia production rate of 97.917 tons/hr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by conducting emission testing in accordance with the methods and procedures specified in Method 1 through 4, and 10 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8,760 hrs/yr, and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the lb/hr emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitations:

194.04 lbs of VOC/hr and 242.38 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

The hourly VOC emission limitation above was developed by multiplying an adjusted uncontrolled (without the MPCS operating) VOC emission factor from AP-42, Table 8.1-1 (dated 7/93) (1.9817 lb/ton of ammonia, which was adjusted from PCS Engineering staff system knowledge, a detailed review of operations history, and process chemistry and conversion data) by the maximum ammonia production rate of 97.917 tons/hr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by conducting emission testing in accordance with the methods and procedures specified in Method 1 through 4, and 18, 25, or 25A, as applicable, of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

Compliance with the annual VOC emission limitation shall be demonstrated by the record keeping requirements specified in d)(1) of this permit.

g) Miscellaneous Requirements

(1) None.