



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

08/07/02

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

**P007 (Building # 27) Liquid Barium, Cadmium,
Zinc Stabilizer Mfg. Unit**

Dover Chemical Corporation (06-79-01-0132)
David L. Rankin
3676 Davis Road
P.O. Box 40
Dover, OH 44622

Dear David L. Rankin:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission 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 within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Southeast District Office at (740) 385-8501.

Very truly yours,

Michael W. Ahern
Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office

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O.E.P.A.
S.E.D.O.



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 08/07/02

Expiration Date: 08/07/07

This document constitutes issuance to:

Facility ID: 06-79-01-0132
Dover Chemical Corporation
3676 Davis Road
PO Box 40
Dover, OH 44622

of a permit to operate for:

P007 (Building # 27)
Liquid Barium, Cadmium, Zinc Stabilizer Mfg. Unit

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Liquid Barium, Cadmium, Zinc Stabilizer Manufacturing Unit vented to an active carbon filter	PTI #06-2473 as modified on May 15, 1996	Organic compound (OC) emissions shall not exceed 450 grams per hour
	OAC 3745-17-07(A)	Particulate emissions (PE) shall not exceed 0.6 grams per hour. Visible emissions (VE) from the stack shall not exceed 20% opacity as a 6-minute average except as provided by rule.
	OAC 3745-17-11	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

None

B. Operational Restrictions

- The temperature of the carbon bed, after regeneration (including any cooling cycle(s)), shall not be greater than ambient temperature.
- After each adsorption cycle of not more than 300 hours, the active carbon filter shall be regenerated.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the carbon bed after regeneration (including any cooling cycle(s)) when the source is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- The temperature of the carbon bed after each regeneration cycle (including any cooling cycle(s)).
- A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- Cumulative adsorption time for the active carbon filter since the last regeneration.

D. Reporting Requirements

1. The permittee shall submit temperature deviation (excursion) reports that identify:
 - a. all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration (including any cooling cycle(s)) exceeded the temperature limitation specified above; and
 - b. all cumulative adsorption times for the active carbon filter since the previous regeneration which exceeded 300 hours.

E. Testing Requirements

1. Emission Limitations:
OC emission limit of 450 grams per hour and the PE limit of 0.6 gram per hour

Compliance Method:

Compliance with the OC emission limit of 450 grams per hour and the PE limit of 0.6 gram per hour has been determined through testing a similar process at another location. No testing is specifically required by this permit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing would be required to comply with methods described in OAC rule 3745-21-10 for OC and/or OAC rule 3745-17-03 for PE.

2. Emission Limitation:
VE from the stack shall not exceed 20% opacity as a 6-minute average

Compliance Method:

If required, compliance with the VE limit shall be determined through VE observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Liquid Barium, Cadmium, Zinc Stabilizer Manufacturing Unit vented to an active carbon filter	PTI #06-2473 as modified on May 15, 1996 OAC 3745-17-07(A) OAC 3745-17-11	Organic compound emissions shall not exceed 450 grams per hour Particulate matter emissions shall not exceed 0.6 grams per hour. Visible emissions from the stack shall not exceed 20% opacity except as provided 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).

2. Additional Terms and Conditions

None

B. Operational Restrictions

- The temperature of the carbon bed, after regeneration (including any cooling cycle(s)), shall not be greater than [XXXX1] degrees Fahrenheit.
- After each adsorption cycle of not more than 300 hours, the active carbon filter shall be regenerated.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the carbon bed after regeneration (including any cooling cycle(s)) when the source is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- The temperature of the carbon bed after each regeneration cycle (including any cooling cycle(s)).
- A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- Cumulative adsorption time for the active carbon filter since the last regeneration.

D. Reporting Requirements

1. The permittee shall submit temperature deviation (excursion) reports that identify:
 - a. all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration (including any cooling cycle(s)) exceeded the temperature limitation specified above; and
 - b. all cumulative adsorption times for the active carbon filter since the previous regeneration which exceeded 300 hours.

E. Testing Requirements

1. Compliance with the organic compound emission limit of 450 grams per hour and the particulate matter emission limit of 0.6 gram per hour has been determined through testing a similar process at another location. No testing is specifically required by this permit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A). Such testing would be required to comply with methods described in OAC rule 3745-21-10 for organic compounds and/or OAC rule 3745-17-03 for particulate matter.
2. Emission Limitation:

If required, compliance with the 20% opacity as a 6-minute average limit shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None