

Facility ID: 1409040987 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1409040987 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. 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>
P001- Process formulation train No. 1	OAC rule 3745-31-05(A)(3) (PTI 14-05819 modified 5/25/06)	Particulate Matter emissions ten microns and less in diameter (PM10) shall not exceed 0.55 lb per hour; and Particulate emissions (PE) and PM10 shall not exceed 2.41 tons per year (TPY). Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11.
	OAC rule 3745-17-07(A)(1)	Volatile organic compound (VOC) emissions shall not exceed 2.84 lbs per hour and 12.44 TPY. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.55 lb per hour.
	OAC rule 3745-21-07(G)	Exempt.
		See section B.1.

2. **Additional Terms and Conditions**
 - (a) The pounds per hour and tons per year emission limitations specified in Section A are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these emission limitations. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the visible emission limitation and the mass emission limitations.

B. Operational Restrictions

1. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit P001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methylene chloride
TLV (ug/m3): 173,681

Maximum Hourly Emission Rate (lbs/hr): 7.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 498

MAGLC (ug/m3): 4135

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall collect and record the following information each month:

- a. the company identification of each liquid organic material employed in this emissions unit; and
- b. a record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

E. Testing Requirements

1. 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Particulate Matter emissions ten microns and less in diameter (PM10) shall not exceed 0.55 lb per hour and 2.41 TPY.

Applicable Compliance Method:

The hourly emission limitation of 0.55 pound per hour was set based on Table I in OAC rule 3745-17-11 and a process weight rate of less than 0.05 ton/hr for the process.

If required, the permittee shall demonstrate compliance with the lb/hr of PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual PE limitation shall be determined by multiplying the maximum hourly PE by the maximum hours of operation and converting to TPY by multiplying by 1 ton/2000 lb.

All PE was assumed to be PM10.

b. Emission Limitations:

2.84 pounds per hour and 12.44 TPY of VOC.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by the VOC emission calculation methodology documented in permit to install application 14-05819, received on February 28, 2006.

If required, the permittee shall demonstrate compliance with the lb/hr of VOC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25a.

Compliance with the annual VOC emission limitation shall be determined by multiplying the maximum hourly VOC emissions by the maximum hours of operation (hr/yr) and converting to TPY by multiplying by 1 ton/2000 lb.

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. None