

Facility ID: 1431070914 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: 1431070914 Emissions Unit ID: P022 Issuance type: Final State Permit To Operate

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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>
spray dryer no. 11 with wet cyclone scrubber and regenerative thermal oxidizer	OAC rule 3745-31-05(A)(3) (PTI 14-04579)	0.41 lb of particulate emissions (PE)/hour; 0.41 lb of particulate matter with a diameter of 10 micron or less (PM-10 emissions)/hour 1.80 tons of PE/year; 1.80 tons of PM-10 emissions/year 0.60 lb of organic compound (OC) emissions/hour; 2.63 tons of OC emissions/year The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). See section A.2.b below.
	OAC rule 3745-17-07(A)(1)	See section A.2.a below.
	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The OC emission limitations specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
The hourly and annual emission limitations specified above are based upon the emissions unit's potential to emit. Therefore, no hourly and annual records are required to demonstrate compliance with these limitations.

B. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1,517 degrees Fahrenheit (based on the November 1, 2000 stack test).
2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 0.84 inch of water column at all times while this emissions unit is in operation.
3. The scrubber water flow rate shall be continuously maintained at a value of not less than 9 gallons of water per minute per 1,000 cubic feet per minute of air at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and

maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1,517 degrees Fahrenheit; and,
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders 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:

- a. the pressure drop across the scrubber, in inches of water column, on a once per shift basis,
 - b. the scrubber water flow rate, in gallons per minute per 1,000 cubic feet of air per minute, on a once per shift basis, and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.
- D. **Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not comply with the minimum temperature limitation specified in section B.1.
 2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. the static pressure drop across the scrubber; and
 - b. the scrubber water flow rate.
 3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. **Testing Requirements**

1. Compliance with the visible particulate emission limitation shall be determined by the method specified in 40 CFR, Part 60, Appendix A, Method 9, pursuant to OAC rule 3745-17-03(B)(1).
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

Compliance with the hourly PE limitation and the hourly PM-10 and OC emission limitations shall be determined, if required, by stack testing using Methods 5, 201 and 25A, respectively, of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

3. Compliance with the annual PE limitation and the annual PM-10 and OC emission limitations is ensured if compliance is maintained with the hourly PE limitation and the hourly PM-10 and OC emission limitations.
4. Compliance with the operating restrictions in section B shall be determined using the record keeping pursuant to section C.
5. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC and PE.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for OC - Method 25A of 40 CFR, Part 60, Appendix A; and for PE - Method 5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless

otherwise specified or approved by the Hamilton County Department of Environmental Services.

F. **Miscellaneous Requirements**

1. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of OAC rule 3745-15-07, the permittee shall be required to submit and implement a control program that will bring this unit into compliance.