

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: P002 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>
P002 - Spray Dryer 4	OAC rule 3745-31-02(A)(2) (PTI 14-05386)	Organic compound (OC) emissions from the spray dryer shall not exceed 0.81 pound per hour and 3.55 tons per year. Particulate emissions* (PE) and particulate matter emissions ten microns and less in diameter (PM10) from the spray dryer shall not exceed 0.23 pound per hour and 1.0 ton per year. * PE = PM10
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- (a) The hourly and annual emission limitations outlined in term A.1 are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limits.
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a scrubber and a panel filter with at least a 97% overall control efficiency for particulate emissions and a thermal oxidizer with at least a 97% control efficiency for organic compound emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the cyclonic scrubber water flow rate during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the water flow rate on daily basis.

Whenever the monitored value for the water flow rate falls below the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and

the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the water flow rate immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The scrubber water flow rate for the cyclonic scrubber shall be continuously maintained at a value of not less than 500 gallons per minute at all times while the emissions unit is in operation.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the average combustion temperature within the thermal incinerator when the emissions unit is in operation, including periods of startup and shutdown. 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 permittee shall record the average combustion temperature for each three-hour shift on a daily basis.

Whenever the monitored value for the average combustion temperature falls below the value specified below for any continuous three-hour block of time when the emissions unit is in operation, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the thermal incinerator temperature immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not fall below 1554 degrees Fahrenheit.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the average combustion temperature based upon information obtained during future organic compound emission tests that demonstrate compliance with the allowable organic compound emission rate for this emissions unit. In addition, approved revisions to the average combustion temperature will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all days during which the scrubber flow rate for the cyclonic scrubber were not maintained at the required levels outlined in term C.1. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in term C.2. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
3. The deviation (excursion) 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 emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

Organic compound (OC) emissions from the spray dryer shall not exceed 0.81 pound per hour and 3.55 tons per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor, 27 lbs/hr, by the control efficiency of the thermal oxidizer (1-0.97). Annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year and dividing by 2000 lbs/ton. The emissions factors were provided in PTI application 14-05386 submitted November 27, 2002.

b. Emissions Limitation:

Particulate emissions (PE) and particulate matter emissions ten microns and less (PM10) from the spray dryer shall not exceed 0.23 pounds per hour and 1.0 ton per year

Applicable Compliance Method:

Compliance with the emission limitation shall be determined by multiplying the production rate (150 lbs/hr) by the loss factor (0.05) by the control efficiency of the scrubber and panel filter (1-0.97). Annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year and dividing by 2000 lbs/ton. The emissions factors were provided in PTL application 14-05386 submitted November 27, 2002.

c. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission 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**

1. Since this emissions unit is vented to a common control system and stack that is shared by other emissions units at the facility, the allowable emissions rate during performance tests shall be determined by adding together the hourly emissions rates for all emissions units sharing the common control system and stack.