

Facility ID: 1431072600 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: 1431072600 Emissions Unit ID: P004 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>
drum/container crusher	OAC rule 3745-31-05(A)(3) (PTI 14-04651)	1.65 lbs of organic compound (OC) emissions/hour 39.6 lbs of OC emissions/day 7.23 tons per year (TPY) of OC emissions
	OAC rule 3845-21-07(G)(2)	See Section A.2 below. The hourly and daily OC emission limitations specified by this rule is less stringent than the hourly and daily OC emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The maximum process rate of drums/containers for this emissions unit shall not exceed the following:
 - a. 15 drums/containers per hour;
 - b. 360 drums/containers per day; and
 - c. 131,400 drums/containers per year.
2. The permittee shall not process any drums/containers in this emissions unit that contain or previously contained any of the following materials:
 - a. benzene;
 - b. tetrachloroethane; or
 - c. formaldehyde.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:
 - a. the total number of drums/containers processed each hour of the day; and
 - b. the total number of drums processed each day [summation of (a) for each hour of the day].
2. In order to determine compliance with the material restrictions specified in Section B.2, the permittee shall maintain daily records of the types of materials contained or previously contained in each drum/container (the current electronic profile system will satisfy this requirement).
3. The permit to install for this emissions unit 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. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level

concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: any with the TLV equal to 18,970* ug/m3

TLV (ug/m3): 18,970

Maximum Hourly Emission Rate (lbs/hr): 1.65

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,897

MAGLC (ug/m3): 1,897 based on the TLV/10

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics 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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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.).

If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxics Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

*This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the "Air Toxics Policy."

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services, in writing, of any daily record showing any exceedance of the hourly and/or daily drum/container process rate restriction or the processing of any drum/container that contains or previously contained any prohibited material as specified in Section B.2. These reports shall be submitted to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the OC emission limitations, drum/container process rate restrictions and the material restrictions specified in Sections A and B shall be determined by the following methods:
OC Emission Limitations: 1.65 lbs of OC emissions/hour; 39.6 lbs of OC emissions/day; 7.23 TPY of OC emissions

Applicable Compliance Method: The OC emission limitations were determined by multiplying the number of drums/containers processed (per hour, day and year, respectively) by an emission factor of 0.11 lb of OC emissions per drum/container processed*. Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping requirements specified in Section C.1. In addition, compliance with the daily OC emission limitation is ensured if compliance is maintained with the hourly OC emission limitation. Compliance with the annual OC emission limitation is ensured if compliance is maintained with the daily OC emission limitation.

* The emission factor of 0.11 lb of OC emissions per drum/container was supplied by the permittee.
Drum/Container Process Rate Restrictions: 15 drums/containers per hour; 360 drums/containers per day; 131,400 drums/containers per year

Applicable Compliance Method: Compliance with the hourly and daily drum/container process rate restrictions shall be determined by the record keeping requirements specified in Section C.1. Compliance with the annual drum/container process rate restriction is ensured if compliance is maintained with the daily drum/container process rate restriction.
Material Restrictions: The permittee shall not process any drum/container that contains or previously contained benzene, tetrachloroethane or formaldehyde.

Applicable Compliance Method: Compliance with the material process restriction shall be determined by the

record keeping requirements specified in Section C.2.

F. **Miscellaneous Requirements**

1. None