

Facility ID: 1431074228 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: 1431074228 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-Fluid Bed Granulator	OAC rule 3745-31-05(A)(3) (PTI# 14-05893)	Organic compound (OC) emissions shall not exceed 14.7 pounds per hour and 24.82 tons per year.
		Particulate emissions (PE) and emissions of particulate matter 10 microns or less in diameter (PM10) shall not exceed 0.03 pound per hour and 0.08 ton per year.
		See term A.2.c and section B.1.
	OAC rule 3745-17-07(A)(1)	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	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 3745-21-07(G)(2)	Exempt, see section B.2.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) is necessary due to the fact that the emissions unit was installed prior to August 3, 2006, as stated in ORC 3704.03(T)(4). Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of HEPA filtration, an operating hour limitation, and compliance with the visible and mass emission limitations. Visible particulate emissions from this emissions unit shall not exceed 10 percent opacity, as a six minute average.

B. Operational Restrictions

1. The actual liquid organic material usage amount in this emissions unit shall not exceed an annual limit of 24.82 tons per year. This assumes that the amount of liquid organic material used is equivalent to the amount of OC emissions that will be emitted.
2. 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 permittee shall collect and record the following information each day for each batch using organic liquids:
 - a. date the batch was produced;
 - b. the total OC usage (the amount of liquid organic material used) in pounds per batch;
 - c. production run time for each batch, in hours; and
 - c. the hourly OC usage rate (b/c).

These records shall be summarized at the end of each calendar year to determine the annual OC emissions.

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).
3. The permit to install for 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). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropanol
 TLV (mg/m3): 491.53
 Maximum Hourly Emission Rate (lbs/hr): 14.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6385
 MAGLC (ug/m3): 11703

Physical changes to or changes in the method of operation of the emission units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still satisfy the "Air Toxic Policy":

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

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly OC emission limitation of 14.7 lbs/hour, and the actual OC emissions for each such hour.
2. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit an annual report which specifies the total liquid organic material usage in this emissions unit for the previous calendar. This report shall be submitted to the Hamilton County Environmental Services by January 31 of each year.
4. 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 Environmental Services within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 shall be determined by the following methods:

Emission Limitation:
 Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a 6-minute average.

Applicable Compliance Method:
 Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

Emission Limitations:
 Particulate emissions (PE) and emissions of particulate matter 10 microns or less in diameter (PM10) shall not

exceed 0.03 pound per hour and 0.08 ton per year.

Applicable Compliance Method:

Compliance shall be determined utilizing the total material maximum throughput (286.6 lbs/batch) divided by the run time per cycle (3.25 hours) times 1 minus the minimum overall particulate control efficiency of 99.97%, as provided in permit to install application number 14-05893 received on November 9, 2006. The annual emissions rate shall be determined by multiplying the hourly emissions rate by the actual production run time for this emissions unit, not including turn around time between batches, divided by 2000 lbs/ton. All PE is assumed to be PM10 emissions.

Emission Limitations:

Organic Compound (OC) emissions shall not exceed 14.7 pounds per hour and 24.82 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by utilizing the recorded liquid organic material usage (lbs/batch) divided by the running time of the batch in hours, excluding turn around time. The annual emission rate shall be determined by summing the annual OC usage.

2. Compliance with the operation restriction in section B.1 shall be demonstrated by the record keeping in section C.1.
3. Compliance with the operational restriction in section B.2 shall be demonstrated by the record keeping in section C.2.

F. Miscellaneous Requirements

1. None