

Facility ID: 1431080082 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: 1431080082 Emissions Unit ID: P009 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>
soil vapor extraction system with catalytic oxidizer or *carbon adsorption (canisters)	OAC rule 3745-31-05(A)(3) (PTI 14-4370)	4.20 lbs of organic compounds (OC)/hr 18.40 tons per year (TPY) of OC
*The carbon adsorption unit is employed as a backup control when the catalytic oxidizer is undergoing maintenance.		The hourly emission limitation specified above is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.
	OAC rule 3745-21-07(G)(2)	The hourly OC emission limitation established by this rule is less stringent than the hourly OC emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		40 lbs of OC/day (photochemically reactive materials are extracted)

2. **Additional Terms and Conditions**
 - (a) The permittee shall maintain and operate a catalytic oxidizer or carbon adsorption system to control all OC emissions from this emissions unit.

B. Operational Restrictions

1. If the laboratory analyses of the OC samples taken at the vacuum blower discharge for two consecutive months indicate that uncontrolled OC emissions for the day are below 10 pounds, then the OC emissions controls employed for this emissions unit (catalytic oxidizer or carbon adsorption) shall not be required after submission of the notification pursuant to Section D.1.
2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation and the catalytic incinerator is being used, shall not be less than 500 degrees Fahrenheit or more than 50 degrees Fahrenheit below the temperature specified by the manufacturer. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 320 degrees Fahrenheit or less than 80 percent of the average temperature difference specified by the manufacturer.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall measure and record, at least one day each month, the daily OC emissions at both the vacuum blower discharge (uncontrolled emissions) and at the air discharge locations (controlled emissions) for this emissions unit, in pounds.
2. When the catalytic oxidizer is used, the permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed 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 monitors and recorder(s) 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 the catalytic oxidizer is in operation:

- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 500 degrees Fahrenheit or more than 50 degrees Fahrenheit below the temperature specified by the manufacturer;
- b. all 3-hour blocks of time (when the emissions unit was in operation), during which the average temperature difference across the catalyst bed was less than 320 degrees Fahrenheit or less than 80 percent of the average temperature difference specified by the manufacturer; 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 reports of the following records:
 - a. all 3-hour blocks of time (when the emissions unit was in operation and the catalytic oxidizer is employed) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 500 degrees Fahrenheit or more than 50 degrees Fahrenheit below the temperature specified by the manufacturer;
 - b. all 3-hour blocks of time (when the emissions unit was in operation and the catalytic oxidizer is employed), during which the average temperature difference across the catalyst bed was less than 320 degrees Fahrenheit or less than 80 percent of the average temperature difference specified by the manufacturer; 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 and the catalytic oxidizer is employed.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services that specify the results of the measured OC emissions, in pounds per day, for each month of the reporting period (January through June and July through December). These reports shall be submitted by January 31 and July 31 of each year.

If the uncontrolled OC emissions, as measured at the vacuum blower discharge, indicate that the daily uncontrolled OC emission rate is below 10 pounds per day for two consecutive months and the permittee desires to cease use of the emission control (catalytic oxidizer or carbon adsorption), the permittee shall submit a written report to the Hamilton County Department of Environmental Services within 30 days. The report shall specify the OC emission measurements recorded for the previous two months and the beginning date that the OC emission control equipment will not be employed.

3. If after such time the emission control equipment is not employed pursuant to the terms and conditions specified in Sections B.1 and D.1, and any OC emission measurement taken, as specified in Section C.1, indicates that uncontrolled OC emissions exceed 10 lbs/day, then the permittee shall do the following:
 - a. submit a report to Hamilton County Department of Environmental Services that identifies the daily OC emission rate exceeding 10 lbs/day; and
 - b. begin employing the OC emission control equipment.

The permittee shall submit the report to the Hamilton County Department of Environmental Services and begin employing the OC emission control equipment within 30 days after such event occurs.

4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing when the carbon adsorption system or the catalytic oxidizer was required to be employed and was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the hourly, daily, and annual OC emission limitations specified in Section A.1 of this permit shall be determined in accordance with the following method:

OC Emission Limitation: 4.20 lbs of OC/hr; 40 lbs of OC/day; 18.40 TPY of OC

Applicable Compliance Method: Compliance with the hourly OC emission limitation has been determined by multiplying the maximum uncontrolled emission rate (84 lbs/hr) by one minus the fractional control efficiency of the emission control system employed (0.95). Compliance with the daily OC emission limitation shall be determined by the record keeping performed pursuant to Section C.1. Compliance with the annual emission limitation is ensured as long as compliance with the hourly emission limitation is maintained.

F. Miscellaneous Requirements

1. None