

Facility ID: 1431483219 Issuance type: Final State Permit To Operate

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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: 1431483219 Emissions Unit ID: P012 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>
dichlorobenzidine (DCB) reaction tank #2 with wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 14-04950)	0.16 lb/hr of particulate emissions (PE) 0.16 lb/hr of particulate matter emissions with a diameter of 10 microns or less (PM10) 0.18 TPY of PE 0.18 TPY of PM10 emissions 0.065 lb/hr of hydrochloric acid (HCl) emissions 0.071 TPY of HCl emissions See Section A.2 below.
	OAC rule 3745-17-11(B)(1)	The PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is the same as the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The hourly and annual emission limitations specified above are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.

The hourly emission limitations for PE/PM10 and HCl emissions are based upon the maximum hourly material throughputs of 0.8 ton of DCB and 0.36 ton of HCl. The annual emission limitations for PE/PM10 and HCl emissions are based upon the maximum annual material throughputs of 1,752 tons of DCB and 788.4 tons of HCl.
Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by the PTI.

B. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 0.5 inch of water at all times while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 50 gallons per minute at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. 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.

b. The scrubber water flow rate, in gallons per minute.

c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit 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.
 - b. The scrubber water flow rate.
2. All quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible PE limitation, and the PE, PM10 and HCl emission limitations specified in Section A and the scrubber operational restrictions specified in Section B shall be determined by the following methods:
PE/PM10 Emission Limitation: 0.16 lb/hr of PE/PM10 emissions

Applicable Compliance Method: The hourly PE/PM10 emission limitations are based upon the emissions unit's potential to emit and were established by multiplying the maximum hourly throughput rate of DCB (0.8 ton/hour) by the emission factor of 20 lbs of PE/PM10/ton* of DCB employed, and multiplied by (1 - the fractional control efficiency (0.99) of the scrubber, for PE/PM10 emissions).

* From AP-42, Fifth Edition, Chapter 6.4, Table 6.4-1, dated May 1983.
PE/PM10 Emission Limitation: 0.18 TPY of PE/PM10 emissions

Applicable Compliance Method: Method: The annual PE/PM10 emission limitations are based upon the emissions unit's potential to emit and were established by multiplying the maximum annual throughput rate of DCB (1,752 tons/year) by the emission factor of 20 lbs of PE/PM10/ton* of DCB employed, multiplied by (1 - the fractional control efficiency (0.99) of the scrubber, for PE/PM10 emissions), and divided by 2,000 lbs/ton.

* From AP-42, Fifth Edition, Chapter 6.4, Table 6.4-1, dated May 1983.
HCl Emission Limitation: 0.065 lb/hr of HCl emissions

Applicable Compliance Method: The hourly HCl emission limitation is based upon the emissions unit's potential to emit and was established by multiplying the maximum hourly throughput rate of HCl (0.36 ton/hour) by the emission factor of 1.8 lbs of HCl/ton* of HCl employed, and multiplied by (1 - the fractional control efficiency (0.90) of the scrubber, for HCl emissions).

* From AP-42, Fifth Edition, Chapter 8, Table 8.6-1, dated July 1993.
HCl Emission Limitation: 0.071 TPY of HCl emissions

Applicable Compliance Method: The annual HCl emission limitation is based upon the emissions unit's potential to emit and was established by multiplying the maximum annual throughput rate of HCl (788.4 tons/year) by the emission factor of 1.8 lbs of HCl/ton* of HCl employed, multiplied by (1 - the fractional control efficiency (0.90) of the scrubber, for HCl emissions), and divided by 2,000 lbs/ton.

* From AP-42, Fifth Edition, Chapter 8, Table 8.6-1, dated July 1993.
Visible PE Limitation: Visible PE from any stack shall not exceed a 20% opacity, as a six-minute, except as specified by the PTI.

Applicable Compliance Method: Compliance with the visible PE limitation shall be determined by Test Method 9 of 40 CFR, Part 60, Appendix A.
Scrubber Operational Restrictions: pressure drop of not less than 0.5 inch of water column and a scrubber water flow rate of not less than 50 gallons per minute

Applicable Compliance Method: Compliance with the scrubber operating restrictions shall be determined by the record keeping requirements specified in Section C.1.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with Ohio EPA's "Air Toxics Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.