

Facility ID: 1483040192 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: 1483040192 Emissions Unit ID: P005 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>
P005 - Purification No. 2 process (Room 212)	OAC rule 3745-31-05(A)(3) PTI 14-05511	2.47 lbs OC/hr, 9.95 TPY OC  See T&C B.1.
VF-405-044 Exhaust; Tanks T-207 and T-208, Dissolvers D-201 and D-202, Poly Drum, Slot Hood (low level), Exhaust Grille	OAC rule 3745-21-07(G)	The emissions unit is exempt from the requirements of this rule. See term A.2.c.

**2. Additional Terms and Conditions**

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the annual operating hours operational restriction and compliance with the OC emissions limitations. The hourly emission limitation(s) outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

**B. Operational Restrictions**

1. The maximum annual operating hours for emissions unit P005, when emissions are being generated from the use of SDA-3A alcohol, shall not exceed 8064 hours per year.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain daily records of the following information for emissions unit P005:
  - a. a record of the operating hours for 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).
2. The permit to install for emissions units P003, P004 and P005, combined, was evaluated based on the actual materials (typically coatings and cleanup 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 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methanol  
 TLV (ug/m3): 262,000  
 Maximum Hourly Emission Rate (lbs/hr): 0.84  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350  
 MAGLC (ug/m3): 6240

Pollutant: Ethanol  
 TLV (ug/m3): 1,881,000

Maximum Hourly Emission Rate (lbs/hr): 15.66  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 6602  
 MAGLC (ug/m3): 44,800

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), 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 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) is (are) defined as a modification under other provisions of the modification definition, 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 Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic 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 Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit annual reports which specify the total OC emissions from emissions unit P005 for the previous calendar year. The permittee shall submit the reports to the Hamilton County Department of Environmental Services by January 31 of each year and shall cover the previous calendar year.
3. 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 Department of Environmental Services within 45 days after the exceedance occurs.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing if the percentage of methanol in the SDA-3A exceeds that which is outlined in PTI application 14-05511. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

#### E. Testing Requirements

1. Emissions Limitations
 

2.47 lbs OC/hr from the purification #2 VF-405-044 exhaust

Applicable Compliance Method

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the requirements outlined in PTI 14-05511 issued on 4/8/2004.
2. Emissions Limitations
 

9.95 TPY OC from the purification VF-405-044 exhaust

Applicable Compliance Method

Compliance with the annual OC emissions limitations shall be demonstrated by the following:

multiplying the "emissions factor", the lbs OC/hr emissions as measured in the latest emissions test of the VF-405-044 exhaust pursuant to T&C E.1., by the actual annual production schedule, in hours/year, of the previous calendar year for the Purification No.2 Process. The permittee shall divide by 2000 so that the product equals TPY OC.
3. Compliance with the hours of operation limitation in term B.1 shall be demonstrated by the record keeping in term

C.1.

F. **Miscellaneous Requirements**

1. None