

Facility ID: 1652100011 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.

[Go to Part II for Emissions Unit P005](#)

[Go to Part II for Emissions Unit P011](#)

[Go to Part II for Emissions Unit P018](#)

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Facility ID: 1652100011 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 - Anhydro Type III AK 6/8 Spray Dryer (The terms and conditions in this permit supercede the terms and conditions in PTI 16-149 issued on 9/30/1981) - Spray Dryer 2. | OAC rule 3745-31-05(A)(3) (PTI 16-02257) | 0.2 pound of particulate emissions (PE) per hour |
| | | 0.9 ton of PE per year |
| | | 42.72 pounds of organic compounds (OC) per day |
| | | 7.8 tons of OC per year |
| | OAC rule 3745-17-07(A) | The visible particulate emissions from the stack shall not exceed 5 percent opacity, as a six-minute average. 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). |

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

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water 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 monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
0.2 pound of PE per hour

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the procedures and test(s) methods in OAC rule 3745-17-03(B)(10).
Emission Limitation:

0.9 ton of PE per year

Applicable Compliance Method:

Multiply the hourly allowable particulate emission limitation by 8760 hours per year, and then divide by 2000.
Emission Limitation:

42.72 pounds of OC per day

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the procedures and test(s) methods in OAC rule 3745-21-10(C).
Emission Limitation:

7.8 tons of OC per year

Applicable Compliance Method:

Multiply the hourly allowable organic compounds emission limitation by 8760 hours per year, and then divide by 2000.
Emission Limitation:

The visible particulate emissions from the stack shall not exceed 5 percent opacity, as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic 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.

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Facility ID: 1652100011 Emissions Unit ID: P011 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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> |
|--|--|--|
| P011 - Anhydro Type III AK 6/8 Spray Dryer (The terms and conditions in this permit supercede the terms and conditions in PTI 16-1497 issued on 8/2/1995) - Spray Dryer 3. | OAC rule 3745-31-05(A)(3) (PTI 16-02257) | 0.2 pound of particulate emissions (PE) per hour 0.9 ton of PE per year 42.72 pounds of organic compounds (OC) per day |

7.8 tons of OC per year

The visible particulate emissions from the stack shall not exceed 5 percent opacity, as a six-minute average.

OAC rule 3745-17-07(A)

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).

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water 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 monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

D. **Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions.

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

0.2 pound of PE per hour

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the procedures and test(s) methods in OAC rule 3745-17-03(B)(10).

Emission Limitation:

0.9 ton of PE per year

Applicable Compliance Method:

Multiply the hourly allowable particulate emission limitation by 8760 hours per year, and then divide by 2000.

Emission Limitation:

42.72 pounds of OC per day

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the procedures and test(s) methods in OAC rule 3745-21-10(C).

Emission Limitation:

7.8 tons of OC per year

Applicable Compliance Method:

Multiply the hourly allowable organic compounds emission limitation by 8760 hours per year, and then divide by 2000.

Emission Limitation:

The visible particulate emissions from the stack shall not exceed 5 percent opacity, as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

F. **Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic 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.

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Facility ID: 1652100011 Emissions Unit ID: P018 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> |
|--|--------------------------------------|---|
| P018 - 1.5 million Btu/hr natural gas fired oven (The terms and conditions in this permit (PTI 16-02257) supercede the terms and conditions in PTI 16-1673 issued on 6/25/1997) - Binder Burnout Oven 5. | OAC rule 3745-31-05(A)(3) | 37.44 pounds of organic compounds (OC) per day 6.83 tons of OC per year Natural gas combustion emissions from the binder burnout oven shall not exceed the following: 0.15 pound of nitrogen oxides (NOx) per hour and 0.66 ton of NOx per year 0.12 pound of carbon monoxide (CO) per hour and 0.53 ton of CO per year 0.01 pound of particulate emissions (PE) per hour and 0.05 ton of PE per year 0.02 pound of OC per hour and 0.09 ton of OC per year |

2. Additional Terms and Conditions

- (a) None

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records of all preventive maintenance activities, inspections, and repairs involving this emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall report, within 30 days of occurrence, any changes in oven cycle, parameters related to the efficient operation of the oven, and type of materials supplied to the oven that deviate from the conditions present at the April 1, 1994 emission testing of binder burnout oven #1.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

0.15 pound of NOx per hour

Applicable Compliance Method:

Multiply the emission factor of 100 pounds of NOx per million cubic feet of natural gas fired (AP-42 Table 1.4-1

dated 7/98) by the emissions unit's maximum hourly combustion rate of natural gas (0.00147 MM cubic feet/hour).

Emission Limitation:

0.66 ton of NOx per year

Applicable Compliance Method:

Multiply the hourly allowable NOx emission limitation by 8760 hours per year, and then divide by 2000.

Emission Limitation:

0.12 pound of CO per hour

Applicable Compliance Method:

Multiply the emission factor of 84 pounds of CO per million cubic feet of natural gas fired (AP-42 Table 1.4-1 dated 7/98) by the emissions unit's maximum hourly combustion rate of natural gas (0.00147 MM cubic feet/hour).

Emission Limitation:

0.53 ton of CO per year

Applicable Compliance Method:

Multiply the hourly allowable CO emission limitation by 8760 hours per year, and then divide by 2000.

Emission Limitation:

0.01 pound of PE per hour

Applicable Compliance Method:

Multiply the emission factor of 7.6 pounds of PE per million cubic feet of natural gas fired (AP-42 Table 1.4-2 dated 7/98) by the emissions unit's maximum hourly combustion rate of natural gas (0.00147 MM cubic feet/hour).

Emission Limitation:

0.05 ton of PE per year

Applicable Compliance Method:

Multiply the hourly allowable PE emission limitation by 8760 hours per year, and then divide by 2000.

Emission Limitation:

0.02 pound of OC per hour

Applicable Compliance Method:

Multiply the emission factor of 11 pounds of OC per million cubic feet of natural gas fired (AP-42 Table 1.4-2 dated 7/98) by the emissions unit's maximum hourly combustion rate of natural gas (0.00147 MM cubic feet/hour).

Emission Limitation:

0.09 ton of OC per year

Applicable Compliance Method:

Multiply the hourly allowable OC emission limitation by 8760 hours per year, and then divide by 2000.

Emission Limitation:

37.44 pounds of OC per day

Applicable Compliance Method:

Stack testing may be required in the future in accordance with the procedures and requirements in Methods 1-4, 18 and 25 of 40 CFR Part 60, Appendix A. The need for stack testing will be determined through facility inspections and/or significant change in oven operations.

Emission Limitation:

6.83 tons of OC per year

Applicable Compliance Method:

Multiply the hourly allowable OC emission limitation by 8760 hours per year, and then divide by 2000.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in 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.