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Facility Name: **Cincinnati Specialties Inc**

Application Number: **14-4460**

Date: **June 10, 1998**

**GENERAL PERMIT CONDITIONS**

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

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(OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal &amp; OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|-------------------------------------|--------------------------|---|--|
|-------------------------------|-------------------------------------|--------------------------|---|--|

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Cincinnati Specialties Inc** located in **Hamilton** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

than those established by OAC rule 3745-31-05 (BAT) .

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u>   | <u>BAT Determination</u>  | <u>Applicable Federal &amp; OAC Rules</u>                                 |
|-------------------------------|--|---|---|
| P027                          | Fine chemicals system II reaction tanks with wet scrubber and nitrogen-purged centrifuge | Use of a wet scrubber with at least 98 percent VOC control efficiency, use of a nitrogen-purged centrifuge and compliance with the Air Toxics Policy. | 3745-31-05<br>3745-15-07<br>3745-17-07<br>3745-17-08*<br>3745-21-09 (YY)* |

\*The emission limitations established by these rules are less stringent

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal &amp; OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|-------------------------------------|--------------------------|---|--|
|                               |                                     |                          |   | Less stringent.  |
|                               |                                     |                          |   | Permit Allowable Mass Emissions and/or Control/Usage Requirements        |
|                               |                                     |                          |   | See Additional Special Term and Condition A.1.                           |
|                               |                                     |                          |   | See General Terms.   |
|                               |                                     |                          |   | See Additional Special Term and Condition A.2.                           |
|                               |                                     |                          |   | Less stringent.  |

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\*\* All PM is assumed to be PM<sub>10</sub>.

SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons/Year</u> |
|------------------|------------------|
| Organic Compound | 1.64             |
| PM               | 1.66**           |
| PM <sub>10</sub> | 1.66**           |

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be

reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**CONSTRUCTION COMPLIANCE CERTIFICATION**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Applicable Emission Limitations and/or Control Requirements**

1. The following emission limitations shall not be exceeded:
  - a. 0.38 lb/hr VOC from the scrubber stack (X-289 vent);
  - b. 1.7 lbs/hr VOC from the P-200 vent;
  - c. 8.8 lbs/day fugitive VOC;

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- d. 1.64 TPY total annual VOC (process + fugitive);  
and,
  - e. 9.11 lbs/day PM/PM<sub>10</sub>, 1.66 TPY PM/PM<sub>10</sub>.
2. Visible particulate fugitive emissions shall not exceed 20 percent opacity, as a three-minute average, except as specified by rule.

#### **B. Operational Restrictions**

- 1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 0.13 inches of water at all times when emissions are being vented to the scrubber.
- 2. The scrubber water flow rate shall be continuously maintained at a value of not less than 3.3 gallons per minute at all times when emissions are being vented to the scrubber.

#### **C. Monitoring and Recordkeeping 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, on a once per shift basis;
- b. the scrubber water flow rate, in gallons per minute, on a once per shift basis; and,
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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2. Each record of any monitoring data, testing data and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. Such records may be maintained in computerized form.

**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; and,
  - b. the scrubber water flow rate.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the emission limitations set forth in this permit. The permittee shall submit reports which identify all exceedances of these limitations, as well as corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.
3. The permittee shall submit required reports in the following manner:
  - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Department of Environmental Services; and,
  - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been

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detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**E. Compliance Methods/Testing Requirements**

1. Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI application 14-4460 submitted 9/29/97 and revised 2/25/98.
2. Compliance with the opacity limitation stated in A.2. shall be demonstrated by methods outlined in OAC rule 3745-17-03(B) (3).

**F. Miscellaneous Requirement**

1. The requirements of this permit shall supersede all the Air Pollution Control requirements for this emissions unit contained in the permit to install (14-4197) as issued on October 17, 1996.
2. The hourly and daily emission limitations outlined are based upon the emissions units potential to emit. Therefore, no hourly or daily records are required to demonstrate compliance with these limits.