



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

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**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

10/9/2008

Certified Mail

Mike Black  
The Scotts Co.  
14111 Scottslawn Road  
Marysville, OH 43041

|     |                      |
|-----|----------------------|
| No  | TOXIC REVIEW         |
| No  | PSD                  |
| Yes | SYNTHETIC MINOR      |
| No  | CEMS                 |
| No  | MACT                 |
| No  | NSPS                 |
| No  | NESHAPS              |
| No  | NETTING              |
| No  | MAJOR NON-ATTAINMENT |
| No  | MODELING SUBMITTED   |

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0180010008  
Permit Number: 01-08386  
Permit Type: Administrative Modification  
County: Union

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA DAPC, Central District Office

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install  
for  
The Scotts Co.**

Facility ID: 0180010008  
Permit Number: 01-08386  
Permit Type: Administrative Modification  
Issued: 10/9/2008  
Effective: 10/9/2008





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 The Scotts Co.

**Table of Contents**

Authorization ..... 1

A. Standard Terms and Conditions ..... 3

    1. Federally Enforceable Standard Terms and Conditions ..... 4

    2. Severability Clause ..... 4

    3. General Requirements ..... 4

    4. Monitoring and Related Record Keeping and Reporting Requirements ..... 5

    5. Scheduled Maintenance/Malfunction Reporting ..... 6

    6. Compliance Requirements ..... 6

    7. Best Available Technology ..... 7

    8. Air Pollution Nuisance ..... 7

    9. Reporting Requirements ..... 7

    10. Applicability ..... 8

    11. Construction of New Sources(s) and Authorization to Install ..... 8

    12. Permit-To-Operate Application ..... 9

    13. Construction Compliance Certification ..... 9

    14. Public Disclosure ..... 9

    15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission  
         Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 9

    16. Fees ..... 9

    17. Permit Transfers ..... 10

    18. Risk Management Plans ..... 10

    19. Title IV Provisions ..... 10

B. Facility-Wide Terms and Conditions ..... 11

C. Emissions Unit Terms and Conditions ..... 13

    1. P020, BB Pest Mix Tanks ..... 14

    2. P067, BB Pest Blender ..... 18

    3. P068, BB Drum Handling ..... 24

    4. T012, Bifenthrin Storage Tank ..... 28





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

## Authorization

Facility ID: 0180010008  
Facility Description: Fertilizers, Mixing only  
Application Number(s): A0001709  
Permit Number: 01-08386  
Permit Description: Bulk blend source P067.  
Permit Type: Administrative Modification  
Permit Fee: \$100.00  
Issue Date: 10/9/2008  
Effective Date: 10/9/2008

This document constitutes issuance to:

The Scotts Co.  
14111 Scottslawn Road  
Marysville, OH 43041

Of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

## Authorization (continued)

Permit Number: 01-08386  
 Permit Description: Bulk blend source P067.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

|                                   |                         |
|-----------------------------------|-------------------------|
| <b>Emissions Unit ID:</b>         | <b>P020</b>             |
| Company Equipment ID:             | BB Pest Mix Tanks       |
| Superseded Permit Number:         |                         |
| General Permit Category and Type: | Not Applicable          |
| <b>Emissions Unit ID:</b>         | <b>P067</b>             |
| Company Equipment ID:             | BB Pest Blender         |
| Superseded Permit Number:         |                         |
| General Permit Category and Type: | Not Applicable          |
| <b>Emissions Unit ID:</b>         | <b>P068</b>             |
| Company Equipment ID:             | BB Drum Handling        |
| Superseded Permit Number:         |                         |
| General Permit Category and Type: | Not Applicable          |
| <b>Emissions Unit ID:</b>         | <b>T012</b>             |
| Company Equipment ID:             | Bifenthrin Storage Tank |
| Superseded Permit Number:         |                         |
| General Permit Category and Type: | Not Applicable          |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been 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 Ohio EPA DAPC, Central District Office. 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 (i.e.,



postmarked) quarterly, by January 31, April 30, July 31, and October 31 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. 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.

## **15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

## **C. Emissions Unit Terms and Conditions**



**1. P020, BB Pest Mix Tanks**

**Operations, Property and/or Equipment Description:**

Pesticide Mix

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures  |
|----|-------------------------------|--|
| a. | OAC rule 3745-31-05(A)(3)     | Organic compound (OC) emissions shall not exceed 1.3 pounds per hour and 6.0 tons per year.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D). |
| b. | OAC rule 3745-31-05 (D)       | See b)(2)b. and c) 1 below.  |
| c. | OAC rule 3745-21-07(G)(2)     | 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. The above OC emission limitation of 1.3 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a carbon adsorber when using liquid bifenthrin. Therefore, the monitoring of the organic compound control equipment as established in the following terms and conditions will ensure compliance with these limits when using liquid bifenthrin. The OC emissions from all other pesticides blended in this emissions unit are able to meet the 1.3 pounds per hour limitation at potential to emit without use of the carbon adsorber.
- b. OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067 through P070, and P020 combined.



c) Operational Restrictions

- (1) The permittee shall properly install, operate, and maintain a carbon adsorber to capture OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is using liquid bifenthrin.
- (2) The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (1.04 pounds/hour or 55 ppm).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the total production rate of P020 in tons;
  - b. the total OC emissions for emission unit P020 using the following equation:  
  
(OC emission rate\* in pounds OC per ton of production) x (the production of the emission unit required by Section III.1.a. above);  
  
\* The OC emission rate for liquid bifenthrin use was established by an emissions test conducted on May 21, 2002 on similar emissions units P069, P070, and P106 (System 1,2, and 3 blenders) and the OC emission rate for other pesticides was established by an emissions test for the worst case pesticide (Prowl) conducted on July 10, 2001.
  - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.; and
  - d. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.
- (2) The permittee shall properly operate and maintain equipment to monitor the outlet gases of the activated carbon of the carbon adsorber. The equipment shall be a currently approved Method 21 compliant monitoring device (40 CFR Part 60, Appendix A). The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month liquid bifenthrin is being blended, the permittee shall collect and record the following information on a twice per month basis:

- a. The OC concentration of the outlet gas from the activated carbon in ppm. The permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device records several concentrations;
- b. The production rate of the emission unit at the time the OC concentration is recorded; and



- c. If the concentration exceeds 55 ppm, a record indicating when the activated carbon was replaced.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
- (2) The permittee shall submit quarterly reports which identify all days in which the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm when biweekly monitoring was required because of the use of liquid bifenthrin. The report shall also include each day the activated carbon was replaced. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
- (3) The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that carbon adsorber was not in service when the emissions unit was using liquid bifenthrin. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

OC emissions shall not exceed 1.3 pounds per hour and 6.0 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appedix A, Methods 1-4 and Method 25 or 25A. Alternative U.S. EPA-approved test may be used with prior approval from the Ohio EPA.

Emissions testing was conducted on a similar emissions unit (System 1, 2, and 3 blenders) on May 21, 2002. The emissions test demonstrated compliance with the emission limitation for this emissions unit.

To demonstrate compliance with the annual limitation, the permittee may multiply the hourly emission rates determined through the testing by the maximum annual hours of operation of 8,760. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual OC emission in tons.

- b. Emissions Limitation:

OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067 through P070 and P020 combined.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section III.1. of this permit.

g) Miscellaneous Requirements

- (1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered 01-08386 issued March 4, 2004.



**2. P067, BB Pest Blender**

**Operations, Property and/or Equipment Description:**

Bulk blend blending vessel with carbon adsorber

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures   |
|----|-------------------------------|---|
| a. | OAC rule 3745-31-05(A)(3)     | Organic compound (OC) emissions shall not exceed 1.3 pounds per hour and 6.0 tons per year.<br><br>Particulate emissions shall not exceed 0.15 pound per hour and 0.66 ton per year.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D). |
| b. | OAC rule 3745-31-05 (D)       | See b)(2)b. and c) 1 below.   |
| c. | OAC rule 3745-21-07(G)(2)     | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  |
| d. | OAC rule 3745-17-11(B)        | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).   |
| e. | OAC rule 3745-17-07(A)        | Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.   |

(2) Additional Terms and Conditions

a. The above OC emission limitation of 1.3 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a carbon adsorber when using liquid bifenthrin. Therefore, the monitoring of the carbon adsorber as



established in the following terms and conditions will ensure compliance with these limits when using liquid bifenthrin. The OC emissions from all other pesticides blended in this emissions unit are able to meet the 1.3 pounds per hour limitation at potential to emit without use of the carbon adsorber.

- b. The above particulate emission limitations of 0.1 pound per hour and 0.6 ton per year were established to reflect the potential to emit for this emissions unit as vented to a fabric filter. Therefore, the parametric monitoring of the fabric filter as established in the following terms and conditions will ensure compliance with these limits.
- c. OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067 through P070, and P020 combined.
- d. The permittee shall vent the particulate emissions from the rotary drum blender, screens, surge bin and bagging scales to the baghouse controlling this emissions unit.

c) Operational Restrictions

- (1) The permittee shall properly install, operate, and maintain a carbon adsorber to capture OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is using liquid bifenthrin.
- (2) The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (1.04 pounds/hour or 55 ppm).
- (3) The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
- (4) The permittee shall operate the baghouse whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the total production rate of P067 in tons;
  - b. the total OC emissions for emission unit P067 using the following equation:(OC emission rate\* ) x (the production of the emission unit required by Section III.1.a. above);

\* The OC emission rate for liquid bifenthrin use was established by an emissions test conducted on May 21, 2002 for similar emissions units P069, P070, and P106 (System 1, 2, and 3 blenders) and the OC emission rate for other pesticides was established by an emissions test for the worst case pesticide (Prowl) conducted on July 10, 2001.

- c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.; and



- d. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.
- (2) The permittee shall properly operate and maintain equipment to monitor the outlet gases of the activated carbon of the carbon adsorber. The equipment shall be a currently approved Method 21 compliant monitoring device (40 CFR Part 60, Appendix A). The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month liquid bifenthrin is being blended, the permittee shall collect and record the following information on a twice per month basis:

- a. The OC concentration of the outlet gas from the activated carbon in ppm. The permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device records several concentrations;
  - b. The production rate of the emission unit at the time the OC concentration is recorded; and
  - c. If the concentration exceeds 55 ppm, a record indicating when the activated carbon was replaced.
- (3) The facility shall install, operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across the fabric filter at least once per each operating shift of the emissions unit.
- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the



observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
- (2) The permittee shall submit quarterly reports which identify all days in which the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm when biweekly monitoring was required because of the use of liquid bifenthrin. The report shall also include each day the activated carbon was replaced. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
- (3) The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
- (4) The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the fabric filter was not in service when the emissions unit was in operation and/or when the carbon adsorber was not in service when the emissions unit was using liquid bifenthrin. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
- (5) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month periods.

f) Testing Requirements

- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
Particulate emissions shall not exceed 0.15 pound per hour and 0.66 ton per year.



Applicable Compliance Method:

To determine compliance with the hourly particulate limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 2.5 years of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the federally enforceable control efficiency requirement.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-5 for particulate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Central District Office.

To determine compliance with the annual particulate limitation, the permittee shall multiply the particulate emission rate in pounds per hour determined through the testing required above by the maximum hours of operation (8,760 hours). The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual particulate emissions in tons.

b. Emission Limitation:

OC emissions shall not exceed 1.3 pounds per hour and 6.0 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 25 or 25A. Alternative U.S. EPA-approved test may be used with prior approval from the Ohio EPA.

Emissions testing was conducted on a similar emissions unit (System 1, 2, and 3 blenders) on May 21, 2002. The emissions test demonstrated compliance with the emission limitation for this emissions unit.

To demonstrate compliance with the annual limitation, the permittee may multiply the hourly emission rates determined through the testing by the maximum annual hours of operation of 8,760. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual OC emission in tons.

c. Emissions Limitation:

OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P106, P067 through P070 and P020 combined.



Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section III.1. of this permit.

- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA Central District Office.

- (3) Emission Limitation

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

- g) Miscellaneous Requirements

- (1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered 01-08386 issued March 4, 2004 and 01-03601 April 12, 2005.



**3. P068, BB Drum Handling**

**Operations, Property and/or Equipment Description:**

Bulk blending drum handling, storage and transfer with vented hood and carbon adsorber

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures  |
|----|-------------------------------|--|
| a. | OAC rule 3745-31-05(A)(3)     | Organic compound (OC) emissions shall not exceed 1.3 pounds per hour and 6.0 tons per year.<br><br>Particulate emissions shall not exceed 0.15 pound per hour and 0.6 ton per year.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D). |
| b. | OAC rule 3745-31-05 (D)       | See b)(2)b. and c) 1 below.  |
| c. | OAC rule 3745-21-07(G)(2)     | 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. The above OC emission limitation of 1.3 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a carbon adsorber when using bifenthrin. Therefore, the monitoring of the carbon adsorber as established in the following terms and conditions will ensure compliance with these limits when using liquid bifenthrin. The OC emissions from all other pesticides blended in this emissions unit are able to meet the 1.3 pounds per hour limitation at potential to emit without use of the carbon adsorber.

b. OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067 through P070, and P020 combined.



c) Operational Restrictions

- (1) The permittee shall properly install, operate, and maintain a carbon adsorber to capture OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is using liquid bifenthrin.
- (2) The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (1.04 pounds/hour or 55 ppm).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the total production rate of P068 in tons;
  - b. the total OC emissions for emission unit P068 using the following equation:  
  
(OC emission rate\* in pounds OC per ton of production) x (the production of the emission unit required by Section III.1.a. above);  
  
\* The OC emission rate for liquid bifenthrin use was established by an emissions test conducted on May 21, 2002 on similar emission units P069, P070, and P106 (System 1, 2, and 3 blenders) and the OC emission rate for other pesticides was established by an emissions test for the worst case pesticide (Prowl) conducted on July 10, 2001.
  - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.; and
  - d. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.
- (2) The permittee shall properly operate and maintain equipment to monitor the outlet gases of the activated carbon of the carbon adsorber. The equipment shall be a currently approved Method 21 compliant monitoring device (40 CFR Part 60, Appendix A). The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month liquid bifenthrin is being blended, the permittee shall collect and record the following information on a twice per month basis:

- a. The OC concentration of the outlet gas from the activated carbon in ppm. The permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device records several concentrations;



- b. The production rate of the emission unit at the time the OC concentration is recorded; and
- c. If the concentration exceeds 55 ppm, a record indicating when the activated carbon was replaced

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
- (2) The permittee shall submit quarterly reports which identify all days in which the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm when biweekly monitoring was required because of the use of liquid bifenthrin. The report shall also include each day the activated carbon was replaced. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
- (3) The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that carbon adsorber was not in service when the emissions unit was using liquid bifenthrin. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 1.3 pounds per hour and 6.0 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appedix A, Methods 1-4 and Method 25 or 25A. Alternative U.S. EPA-approved test may be used with prior approval from the Ohio EPA.

Emissions testing was conducted on a similar emissions unit (System 1, 2, and 3 blenders) on May 21, 2002. The emissions test demonstrated compliance with the emission limitation for this emissions unit.

To demonstrate compliance with the annual limitation, the permittee may multiply the hourly emission rates determined through the testing by the maximum annual hours of operation of 8,760. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual OC emission in tons.

b. Emissions Limitation:

OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P106, P067 through P070 and P020 combined.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section III.1. of this permit.

g) Miscellaneous Requirements

- (1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered 01-08386 issued March 4, 2004.



**4. T012, Bifenthrin Storage Tank**

**Operations, Property and/or Equipment Description:**

Bifenthrin pesticide storage tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures   |
|----|-------------------------------|---|
| a. | OAC rule 3745-31-05(A)(3)     | Organic compound (OC) emissions shall not exceed 0.19 ton per year.<br><br>See b)(2)a. below. |
| b. | 40 CFR 60, Subpart Kb         | See b)(2)b. below.  |

(2) Additional Terms and Conditions

a. This emissions unit shall employ submerged fill.

b. In accordance with 40 CFR 60.116b (a) and (b), the owner of the tank shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing its capacity for the life of the storage vessel.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the annual organic compound emissions limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:



Emission Limitation:

Organic compound emissions shall not exceed 0.19 tons per year.

Applicable Compliance Method:

Total organic compound emissions from the storage tank shall be determined using the most recent version of US EPA=s ATanks@ program.

g) Miscellaneous Requirements

- (1) The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

| Source Number | Source Description                                 | NSPS Regulation(Subpart)     |
|---------------|--|------------------------------|
| T012          | 16,500-gallon bifenthrin above-ground storage tank | 40 CFR 60, Subparts A and Kb |

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Air Quality Modeling and Planning  
P.O. Box 1049  
Columbus, OH 43216-1049



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** 01-08386  
**Facility ID:** 0180010008  
**Effective Date:** 10/9/2008

and

Ohio Environmental Protection Agency

DAPC - Central District Office

3232 Alum Creek Drive

Columbus, OH 43207

- (2) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered 01-08386 issued March 4, 2004.