



State of Ohio Environmental Protection Agency

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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

2/24/2010

Certified Mail

Michele Smith
INEOS ABS (USA) Corporation
356 Three Rivers Parkway
Addyston, OH 45001

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1431010054
Permit Number: P0105905
Permit Type: Administrative Modification
County: Hamilton

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

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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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 Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.ohio.gov>.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Hamilton County Dept. of Environmental Services

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
INEOS ABS (USA) Corporation**

Facility ID: 1431010054
Permit Number: P0105905
Permit Type: Administrative Modification
Issued: 2/24/2010
Effective: 2/24/2010



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
INEOS ABS (USA) Corporation

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105905
Facility ID: 1431010054
Effective Date: 2/24/2010

Authorization

Facility ID: 1431010054
Facility Description: plastic polymer manufacturing
Application Number(s): M0000649
Permit Number: P0105905
Permit Description: Administrative modification to PTI 14-05102, as corrective action for NOV.
Permit Type: Administrative Modification
Permit Fee: \$750.00
Issue Date: 2/24/2010
Effective Date: 2/24/2010

This document constitutes issuance to:

INEOS ABS (USA) Corporation
356 Three Rivers Parkway
Addyston, OH 45001-0039

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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: P0105905
Facility ID: 1431010054
Effective Date: 2/24/2010

Authorization (continued)

Permit Number: P0105905
 Permit Description: Administrative modification to PTI 14-05102, as corrective action for NOV.

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

Emissions Unit ID:	P030
Company Equipment ID:	CMPD #9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	CMPD #10
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: P0105905
Facility ID: 1431010054
Effective Date: 2/24/2010

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 Hamilton County Dept. of Environmental Services.



(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 Hamilton County Dept. of Environmental Services. 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services.
- 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 Hamilton County Dept. 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



(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.



17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Hamilton County Dept. of Environmental Services 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: P0105905
Facility ID: 1431010054
Effective Date: 2/24/2010

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105905
Facility ID: 1431010054
Effective Date: 2/24/2010

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: P0105905
Facility ID: 1431010054
Effective Date: 2/24/2010

C. Emissions Unit Terms and Conditions



1. P030, CMPD #9

Operations, Property and/or Equipment Description:

plastic polymer compounding and extrusion process

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) d)(4), d)(5), d)(6), and d)(7).

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) (P0105905)	<p>Particulate Emissions (PE) shall not exceed 4.67 lbs/hr*.</p> <p>Emissions of particulate matter less than 10 microns in diameter (PM10) shall not exceed 3.42 lbs/hr*.</p> <p>The total combined PE and PM10 emissions from emissions units P029, P030, P031, and emission unit's P035 intermediate silos and overhead hoppers shall not exceed 20.46 TPY of PE and 14.92 TPY of PM10.</p> <p>Emissions of Organic Compounds (OC) from the B8 scrubber outlet shall not exceed 8.15 lbs/hr*.</p> <p>OC emissions from thermal oxidizer exhaust outlet shall not exceed 0.41 lb/hr*.</p> <p>OC emissions from thermal oxidizer exhaust outlet shall not exceed 4.57 TPY total.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).</p> <p>* The hourly emission limitations outlined</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		above are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
c.	OAC rule 3745-17-11(B)(1)	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 3745-114-01	See d)(4), d)(5), d)(6), and d)(7).

(1) Additional Terms and Conditions

- a. Particulate emissions from the color weigh area, color charge station, pigment feeders, polymer feeders, and overhead hoppers for emissions unit P030 shall be directed to control devices having control efficiencies of at least 99%, or comply with the PE emission limitations in b)(1)a.
- b. PE and OC emissions from the extruders associated with emissions unit P030 shall be captured and vented to a venturi scrubber having a particulate control efficiency of at least 95%, or comply with the PE emission limitations in b)(1)a. Emissions from the venturi scrubber shall be directed to a thermal oxidizer having a control efficiency of, at least, 95% for OC emissions, except during the allowable scrubber atmospheric venting period. Emissions unit P030 shall not vent to the atmosphere from the scrubber for more than 720 hours per calendar year.
- c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by operating and maintaining dust collectors with at least a 99% PM control efficiency for the color weigh area, color charge station, pigment feeders, polymer feeders, and overhead hoppers; use of a scrubber to control particulate emissions from the extruder with at least a 95% PM control efficiency, or comply with the PE emission limitations in b)(1)a.; use of a thermal oxidizer with at least a 95% OC control efficiency, bypassed to the atmosphere for no more than 720 hours per year; and compliance with Air Toxics Policy.

c) Operational Restrictions

- (1) The pressure drop across the scrubber shall be continuously maintained within the range of 20 to 35 inches of water at all times while emissions unit P030 is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while emissions unit P030 is in operation.
- (2) The permittee shall properly install, operate, and maintain equipment to control particulate emissions from the color weigh area, color charge stations, pigment feeders,



polymer feeders, overhead hoppers and 20 of 28 intermediate silos while emissions unit P030 is in operation. The control devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). Emissions unit P030 shall process only pellets through the uncontrolled intermediate silos.

- (3) The thermal oxidizer's combustion chamber temperature shall not be less than 1450 degrees Fahrenheit, or the three-hour average of the most recent stack test that demonstrated compliance, at any time when organic emissions from emissions unit P030 are being vented to the thermal oxidizer.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain equipment to measure the pressure drop across the scrubber and the scrubber water flow rate while emissions unit P030 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/shift basis;
- b. the scrubber water flow rate, in gallons per minute, on a once/shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

- (2) The permittee shall visually inspect each of the control devices which are required to control particulate emissions from the color weigh area, color charge station, pigment feeders, polymer feeders, and overhead hoppers for emissions unit P030 for visible holes or tears, bag leaks, and excessive dusting or visible emissions on a daily basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected

The permittee shall maintain daily records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion chamber temperature within the thermal oxidizer when emissions unit P030 is venting to the thermal oxidizer. Units shall be in degrees Fahrenheit. The monitoring and control devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record all periods of time during which the combustion chamber temperature of the thermal oxidizer is less than 1450 degrees Fahrenheit while emissions unit P030 is vented to the thermal oxidizer.



The permittee shall maintain records that include the following information for each period during which organic emissions from emissions unit P030 are vented to the atmosphere from the scrubber during thermal oxidizer outages:

- a. the date of the thermal oxidizer control device shutdown; and
 - b. the time interval over which the thermal oxidizer control device shutdown occurred.
- (4) The permit-to-install application for this/these emissions unit(s), P030, was evaluated based on the actual materials and the design parameters of the emissions unit's(s)' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 12 hours per day and 6 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: styrene, w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 85,000(*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 5.7 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 171.6

MAGLC (ug/m3): 2024

Toxic Contaminant: acrylonitrile, w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 4,300 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 0.4 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12

MAGLC (ug/m3): 102

The permittee has demonstrated that emissions of acrylonitrile, from emissions unit(s) P030, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).



If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) 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 pressure drop across the scrubber; and
- b. the scrubber water flow rate.



- (2) The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
- (3) The permittee shall submit deviation reports which provide the following information for each time the thermal oxidizer combustion chamber temperature falls below 1450 degrees Fahrenheit when emissions unit P030 is being vented to the thermal oxidizer:
 - a. the date of the excursion;
 - b. the time interval over which the excursion occurred;
 - c. the temperature values during the excursion;
 - d. the cause(s) for the excursion; and
 - e. the corrective action which has been or will be taken to prevent similar excursions in the future.

The permittee shall notify the Hamilton County Department of Environmental Services in writing of any scheduled major maintenance requiring the shutdown of the thermal oxidizer control device and the scheduled shutdown duration two (2) weeks prior to the shutdown.

- (4) The permittee shall submit annual reports which identify any exceedance of the 720 hours per year limitation for venting to the atmosphere from the scrubber. These reports shall be submitted by January 31 of each year.
- (5) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.
 - b. Emission Limitations:

Emissions of particulate matter less than 10 microns in diameter (PM10) shall not exceed 3.42 lbs/hr*.



The total combined PE and PM10 emissions from emissions units P029, P030, P031, and emission unit's P035 intermediate silos and overhead hoppers shall not exceed 20.46 TPY of PE and 14.92 TPY of PM10.

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be tracked by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI application 14-05102, submitted 02/14/2001.

If testing is required to demonstrate compliance with the allowable PE or PM10 emission limitations, testing shall be conducted using the following methods:

Method 1-5 and/or 201 of 40 CFR, Part 60, Appendix A,

c. Emission Limitations:

Particulate Emissions (PE) shall not exceed 4.67 lbs/hr*.

Applicable Compliance Method:

Compliance with the PE emission rate was demonstrated by stack testing conducted on July 8th, 2009.

If additional testing is required to demonstrate compliance with the allowable particulate emission limitation, testing shall be conducted using the following methods:

Methods 1-5 of 40 CFR, Part 60, Appendix A,

d. Emission Limitations:

8.15 lbs OC/hr from scrubber outlet;

0.41 lb OC/hr from thermal oxidizer exhaust outlet; and

4.57 TPY of OC.

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be tracked by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI application 14-05102, submitted 02/14/2001.

If testing is required to demonstrate compliance with the allowable organic compound emission limitations, then testing shall be conducted using the following methods:

Methods 1-4 and Method 25 or 25A of 40 CFR Part 60, Appendix A.

e. Compliance with the operational restrictions in c)(1), c)(2) and c)(3) shall be demonstrated by the record keeping in d)(1), d)(2) and d)(3).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105905
Facility ID: 1431010054
Effective Date: 2/24/2010

g) Miscellaneous Requirements

(1) None.



2. P031, CMPD #10

Operations, Property and/or Equipment Description:

plastic polymer compounding and extrusion process

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) d)(4), d)(5), d)(6) and d)(7).

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) (P0105905)	<p>Particulate Emissions (PE) shall not exceed 4.67 lbs/hr*.</p> <p>Emissions of particulate matter less than 10 microns in diameter (PM10) shall not exceed 3.42 lbs/hr*.</p> <p>The total combined PE and PM10 emissions from emissions units P029, P030, P031, and emission unit's P035 intermediate silos and overhead hoppers shall not exceed 20.46 TPY of PE and 14.92 TPY of PM10.</p> <p>Emissions of Organic Compounds (OC) from the B8 scrubber outlet shall not exceed 8.15 lbs/hr*.</p> <p>OC emissions from thermal oxidizer exhaust outlet shall not exceed 0.41 lb/hr*.</p> <p>OC emissions from thermal oxidizer exhaust outlet shall not exceed 4.57 TPY total.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).</p> <p>* The hourly emission limitations outlined</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		above are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
c.	OAC rule 3745-17-11(B)(1)	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 3745-114-01	See d)(4), d)(5), d)(6) and d)(7).

(1) Additional Terms and Conditions

- a. Particulate emissions from the color weigh area, color charge station, pigment feeders, polymer feeders, and overhead hoppers for emissions unit P031 shall be directed to control devices having control efficiencies of at least 99%, or comply with the PE emission limitations in b)(1)a.
- b. PE and OC emissions from the extruders associated with emissions unit P031 shall be captured and vented to a venturi scrubber having a particulate control efficiency of at least 95%, or comply with the PE emission limitations in b)(1)a. Emissions from the venturi scrubber shall be directed to a thermal oxidizer having a control efficiency of, at least, 95% for OC emissions, except during the allowable scrubber atmospheric venting period. Emissions unit P031 shall not vent to the atmosphere from the scrubber for more than 720 hours per calendar year.
- c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by operating and maintaining dust collectors with at least a 99% PM control efficiency for the color weigh area, color charge station, pigment feeders, polymer feeders, and overhead hoppers; use of a scrubber to control particulate emissions from the extruder with at least a 95% PM control efficiency, or comply with the PE emission limitations in b)(1)a.; use of a thermal oxidizer with at least a 95% OC control efficiency, bypassed to the atmosphere for no more than 720 hours per year; and compliance with Air Toxics Policy.

c) Operational Restrictions

- (1) The pressure drop across the scrubber shall be continuously maintained within the range of 20 to 35 inches of water at all times while emissions unit P031 is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while emissions unit P031 is in operation.

- (2) The permittee shall properly install, operate, and maintain equipment to control particulate emissions from the color weigh area, color charge stations, pigment feeders,



polymer feeders, overhead hoppers and 20 of 28 intermediate silos while emissions unit P031 is in operation. The control devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). Emissions unit P031 shall process only pellets through the uncontrolled intermediate silos.

- (3) The thermal oxidizer's combustion chamber temperature shall not be less than 1450 degrees Fahrenheit, or the three-hour average of the most recent stack test that demonstrated compliance, at any time when organic emissions from emissions unit P031 are being vented to the thermal oxidizer.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain equipment to measure the pressure drop across the scrubber and the scrubber water flow rate while emissions unit P031 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/shift basis;
- b. the scrubber water flow rate, in gallons per minute, on a once/shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

- (2) The permittee shall visually inspect each of the control devices which are required to control particulate emissions from the color weigh area, color charge station, pigment feeders, polymer feeders, and overhead hoppers for emissions unit P031 for visible holes or tears, bag leaks, and excessive dusting or visible emissions on a daily basis. Corrective actions shall be initiated if any of the above control device malfunctions are detected

The permittee shall maintain daily records of the date, time, and the results of the visual inspections. The date, time, and description of any corrective actions taken to remedy control device malfunctions shall also be recorded.

- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion chamber temperature within the thermal oxidizer when emissions unit P031 is venting to the thermal oxidizer. Units shall be in degrees Fahrenheit. The monitoring and control devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record all periods of time during which the combustion chamber temperature of the thermal oxidizer is less than 1450 degrees Fahrenheit while emissions unit P031 is vented to the thermal oxidizer.



The permittee shall maintain records that include the following information for each period during which organic emissions from emissions unit P031 are vented to the atmosphere from the scrubber during thermal oxidizer outages:

- a. the date of the thermal oxidizer control device shutdown; and
 - b. the time interval over which the thermal oxidizer control device shutdown occurred.
- (4) The permit-to-install application for this/these emissions unit(s), P031, was evaluated based on the actual materials and the design parameters of the emissions unit's(s)' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 12 hours per day and 6 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: styrene, w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 85,000(*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 5.7 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 171.6

MAGLC (ug/m3): 2024

Toxic Contaminant: acrylonitrile, w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 4,300 (*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 0.4 (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12

MAGLC (ug/m3): 102

The permittee has demonstrated that emissions of acrylonitrile, from emissions unit(s) P030, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).



If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) 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 pressure drop across the scrubber; and
 - b. the scrubber water flow rate.



- (2) The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarize any visible inspections that detected a control device malfunction during the previous six months. This report shall also include a description of the corrective actions which have been or will be taken to remedy the control device malfunction(s). The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six (6) calendar months (July through December and January through June, respectively).
- (3) The permittee shall submit deviation reports which provide the following information for each time the thermal oxidizer combustion chamber temperature falls below 1450 degrees Fahrenheit when emissions unit P031 is being vented to the thermal oxidizer:
 - a. the date of the excursion;
 - b. the time interval over which the excursion occurred;
 - c. the temperature values during the excursion;
 - d. the cause(s) for the excursion; and
 - e. the corrective action which has been or will be taken to prevent similar excursions in the future.

The permittee shall notify the Hamilton County Department of Environmental Services in writing of any scheduled major maintenance requiring the shutdown of the thermal oxidizer control device and the scheduled shutdown duration two (2) weeks prior to the shutdown.

- (4) The permittee shall submit annual reports which identify any exceedance of the 720 hours per year limitation for venting to the atmosphere from the scrubber. These reports shall be submitted by January 31 of each year.
- (5) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.
 - b. Emission Limitations:

Emissions of particulate matter less than 10 microns in diameter (PM10) shall not exceed 3.42 lbs/hr*.



The total combined PE and PM10 emissions from emissions units P029, P030, P031, and emission unit's P035 intermediate silos and overhead hoppers shall not exceed 20.46 TPY of PE and 14.92 TPY of PM10.

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be tracked by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI application 14-05102, submitted 02/14/2001.

If testing is required to demonstrate compliance with the allowable PE or PM10 emission limitations, testing shall be conducted using the following methods:

Method 1-5 and/or 201 of 40 CFR, Part 60, Appendix A,

c. Emission Limitations:

Particulate Emissions (PE) shall not exceed 4.67 lbs/hr*.

Applicable Compliance Method:

Compliance with the PE emission rate was demonstrated by stack testing conducted on July 8th, 2009.

If additional testing is required to demonstrate compliance with the allowable particulate emission limitation, testing shall be conducted using the following methods:

Methods 1-5 of 40 CFR, Part 60, Appendix A,

d. Emission Limitations:

8.15 lbs OC/hr from scrubber outlet;

0.41 lb OC/hr from thermal oxidizer exhaust outlet; and

4.57 TPY of OC.

Applicable Compliance Method:

Compliance with the emission limitations outlined in this permit shall be tracked by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI application 14-05102, submitted 02/14/2001.

If testing is required to demonstrate compliance with the allowable organic compound emission limitations, then testing shall be conducted using the following methods:

Methods 1-4 and Method 25 or 25A of 40 CFR Part 60, Appendix A.

e. Compliance with the operational restrictions in c)(1), c)(2) and c)(3) shall be demonstrated by the record keeping in d)(1), d)(2) and d)(3).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105905
Facility ID: 1431010054
Effective Date: 2/24/2010

g) Miscellaneous Requirements

(1) None.