



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
FRANKLIN COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 01-08962**

**Fac ID: 0125963085**

**DATE: 6/2/2005**

Olen Corporation  
Chris Wagner  
4755 South High Street  
Columbus, OH 43207

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

CDO



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 6/2/2005  
Effective Date: 6/2/2005**

---

**FINAL PERMIT TO INSTALL 01-08962**

Application Number: 01-08962  
Facility ID: 0125963085  
Permit Fee: **\$400**  
Name of Facility: Olen Corporation  
Person to Contact: Chris Wagner  
Address: 4755 South High Street  
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4755 South High Street  
Columbus, Ohio**

Description of proposed emissions unit(s):  
**Portable diesel generator.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 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.)

#### 3. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

6

**Olen Corporation**  
**PTI Application: 01-08962**  
**Issued: 6/2/2005**

**Facility ID: 0125963085**

#### 14. Construction Compliance Certification

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

#### 15. 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 this Permit to Install.

### B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	1.3
NOX	18.53
CO	4.0
SO2	1.23
OC	1.48

**PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P001 - Portable Generator Olen no. 43Gen4 Model DCA-220SK Serial No. 3707732 273 HP Diesel engine.	OAC rule 3745-18-06(B)
	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-08(B)
	OAC rule 3745-23-06(B)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(B)(5)(a)

Applicable Emissions  
Limitations/Control  
Measures

Nitrogen oxide (NOx) emissions shall not exceed 7.41 lbs/hour and 18.53 tons per year.

Carbon monoxide (CO) emissions shall not exceed 1.60 lbs/hour and 4.0 tons per year.

Organic Compound (OC) emissions shall not exceed 0.59 lb/hour and 1.48 tons per year.

Sulfur Dioxide (SO2) emissions shall not exceed 0.49 lbs/hour and 1.23 tons per year.

Particulate Emissions shall not exceed 0.52 lbs/hour and 1.30 tons per year.

The requirements of this rule also include compliance with the requirements of OAC rules, 3745-17-07(A)(1) and 3745-17-11(B)(5)(b).

Visible particulate emissions shall not exceed 20% opacity, as a six(6)-minute average, except as provided by the rule.

The particulate emissions from the engine's exhaust shall not exceed 0.25 pound per million Btu of actual heat input. See Section A.2.b. below.

See Section A.2.c. below.

See Section A.2.d. below.

See Section A.2.e. below.

## 2. Additional Terms and Conditions

- 2.a** The hourly emissions limitations for this emissions unit were established to reflect the potential to emit. Therefore, with the exception of the fuel oil analysis, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these limits.
- 2.b** This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.c** OAC rule 3745-18-06(B) exempts stationary internal combustion engines which have rated heat input capacities equal to, or less than, 10 MMBTU/hr from the sulfur dioxide emission limit in OAC rule 3745-18-06(G). This emissions unit has a rated heat input of less than 10 MMBTU/hr.
- 2.d** The design of the emissions unit and the technology associated with the current operating practices will satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On February 15, 2005, OAC rule 3745-23-06 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

11

**Olen Corporation**

**PTI Application: 01 09062**

**Issued**

**Facility ID: 0125963085**

**Emissions Unit ID: P001**

## B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 5000 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative operating hours in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	333
1-2	666
1-3	999
1-4	1332
1-5	1665
1-6	5000
1-7	5000
1-8	5000
1-9	5000
1-10	5000
1-11	5000
1-12	5000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cumulative operating hour limitation shall be based upon a rolling, 12-month summation of the hours of operation.

2. The permittee shall burn only no. 2 fuel oil in this emissions unit.
3. The quality of the no. 2 fuel oil burned in this emissions unit shall meet a sulfur content which is equal to or less than 0.5 weight percent sulfur on an "as burned" basis.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month;

- b. the rolling, 12-month summation of the operating hours; and
  - c. the type and amount (gallons or cubic feet) of fuel burned based upon the number of hours of operation and the manufacturers fuel consumption specifications.
2. For each day during which the permittee burns a fuel other than no. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
  3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of any oil that is received for burning in this emission unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon approval by the Ohio EPA, Central District Office.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative fuel use;
  - b. any exceedance of the rolling 12-month maximum allowable cumulative operating hours;  
and
  - c. any exceedance of the sulfur content fuel restriction specified in Section B.3.

These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(2).

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than no. 2 fuel oil was burned in the emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Ohio EPA, Central District Office, in writing of any record which shows an exceedance of the sulfur content limitation specified in Section A.1. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the deviation occurs.
4. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria

are met. The portable source shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

- a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
  - i. the portable source is equipped with the best available technology for such portable source;
  - ii. the portable source is operating pursuant to a currently effective permit to install, permit to operate (PTO), or registration status;
  - iii. the applicant has provided proper notice of the intent to relocate the portable source to the (1.) Ohio EPA District Office or local air agency responsible for the permit(s) for the source and (2.) the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
  - iv. in the judgement of the Ohio EPA District Office or local air agency having jurisdiction over the new site, the proposed site is acceptable under OAC rule 3745-15-07.
- b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable source may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:
  - i. the portable source permittee possesses an Ohio EPA PTI, PTO or registration status;
  - ii. the portable source is equipped with best available technology;
  - iii. the portable source owner has identified the proposed site to Ohio EPA;
  - iv. Ohio EPA has determined that the portable source, at the proposed site, will have an acceptable environmental impact;
  - v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
  - vi. the owner of the proposed site has provided the portable source owner with approval or equivalent declaration that it is acceptable to the site owner to move

the portable source to this proposed site; and

- vii. the portable source owner has provided Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for the permitting Ohio EPA District Office or local air agency and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable source must file a " Notice of Intent to Relocate" within the specified time frame (30 or 15 days), prior to the relocation of the portable source with the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA District Office or local air agency responsible for the permits for the portable source, and/or appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

## E. Testing Requirements

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

- a. Emissions Limitations:

Combustion emissions shall not exceed the following: NO<sub>x</sub> emissions shall not exceed 7.41 lbs/hr and 18.53 tons/yr; CO emissions shall not exceed 1.6 lb/hr and 4.0 tons/yr; SO<sub>2</sub> emissions shall not exceed 0.49 lb/hr and 1.23 tons/yr ; and OC emissions shall not exceed 0.59 lb/hr and 1.48 tons/yr ; and PE shall not exceed 0.52 lb/hr and 1.3 tons/yr.

Applicable Compliance Method:

Compliance with the emission limitations identified above for the diesel engine shall be determined by using the emission factors from AP-42, 5th Edition (October 1996), Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines". The hourly emission rates are multiplied by 5000 hours and converted to tons by dividing by 2000 lbs/ton to obtain the yearly emission rates.

AP-42 Table 3.3-1 for combustion emissions from diesel engines

*Hourly:*

0.31 lb PE/MMBTU \* 12 gal diesel fuel used/hr \* 0.140 MMBTU/gal = 0.52 lb PE/hr  
4.41 lb NO<sub>x</sub>/MMBTU \* 12 gal diesel fuel used/hr \* 0.140 MMBTU/gal = 7.41 lbs  
NO<sub>x</sub>/hr  
0.95 lb CO/MMBTU \* 12 gal diesel fuel used/hr \* 0.140 MMBTU/gal = 1.6 lb CO/hr  
0.29 lb SO<sub>2</sub>/MMBTU \* 12 gal diesel fuel used/hr \* 0.140 MMBTU/gal = 0.49 lb SO<sub>2</sub>/hr  
0.35 lb OC/MMBTU \* 12 gal diesel fuel used/hr \* 0.140 MMBTU/gal = 0.59 lb OC/hr

*Annual:*

0.52 lb PE/hr \* 5000 hrs/yr of operation \* 1 ton/2000 lb = 1.3 tons PE/yr.  
7.41 lbs NO<sub>x</sub>/hr \* 5000 hrs/yr of operation \* 1 ton/2000 lbs = 18.53 tons NO<sub>x</sub>/yr  
1.6 lb CO/hr \* 5000 hrs/yr of operation \* 1 ton/2000 lbs = 4.0 tons CO/yr  
.49 lb SO<sub>2</sub>/hr \* 5000 hrs/yr of operation \* 1 ton/2000 lbs = 1.23 tons SO<sub>2</sub>/yr  
0.59 lb OC/hr \* 5000 hrs/yr of operation \* 1 ton/2000 lbs = 1.48 tons OC/yr

- b. Emission Limitation:  
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:  
The quality of the number 2 fuel oil burned in this emissions unit shall meet a sulfur content which is equal to or less than 0.5 weight percent sulfur on an "as burned" basis.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements pursuant to section C.3 above.

- d. Emissions Limitation:  
PE emissions from the engine exhaust shall not exceed 0.25 lb per MMBTU of actual heat input.

Applicable Compliance Method-

The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96). The Ohio EPA revised the emission limitation specified in this rule citation based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.25 lb/MMBTU actual heat input emission limitation will no longer be applicable, and the permittee will be able to demonstrate compliance with the new emission limitation (0.310 lb/MMBTU actual heat input) using the current emission factor.

## F. Miscellaneous Requirements

None

18

**Olen C**

**PTI A**

**Issued: 6/2/2005**

Emissions Unit ID: **P001**