State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
LICKING COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 01-08237

DATE: 11/20/2001

Safety Kleen Corp
Cynthia Lee
581 Milliken Dr SE
Hebron, OH 43025-9687

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 11/20/2001**
Terms and Conditions **Effective Date: 11/20/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08237

Application Number: 01-08237
APS Premise Number: 0145020235
Permit Fee: **$0**
Name of Facility: Safety Kleen Corp
Person to Contact: Cynthia Lee
Address: 581 Milliken Dr SE
Hebron, OH 43025-9687

Location of proposed air contaminant source(s) [emissions unit(s)]:
581 Milliken Dr SE
Hebron, Ohio

Description of proposed emissions unit(s):
Safety Therm 1 rotary vacuum dryer with condenser located upstream of a regernative fume oxidizer and wet scrubber.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 appropriate Ohio EPA District Office or local air agency. The written 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. See B.10 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.

iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, 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, reopening 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.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

b. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Source Operation and Operating Permit Requirements After Completion of Construction

a. If 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

11. 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.

B. State Only Enforceable 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 Related to Monitoring and Recordkeeping 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 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 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 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. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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).

9. 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.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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

Pollutant	Tons Per Year
Organic Compounds	6.6
Hydrogen Chloride	1.9

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Facility ID: **0145020235**

Emissions Unit ID: **P005**

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

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Safety-Therm #1: rotary vacuum dryer with condenser located upstream of a regenerative fume oxidizer and wet scrubber	OAC rule 3745-31-05(A)	The requirements of this rule also include compliance with the requirements of 40 CFR 63, Subpart DD and OAC rule 3745-21-07(G)(2). Organic compound emissions shall not exceed 1.51 pounds per hour and 6.6 tons per year. Hydrogen chloride emissions shall not exceed 0.44 pound per hour and 1.9 tons per year. See A.II. 6- A.II.11 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), except during "planned routine maintenance". See A.II.3 below.
	40CFR63, Subpart DD	See A.I.2.a. - A.I.2.b. and A.I.2.d, A.II.1. - A.II.5 below.
	OAC rule 3745-23-06(B)	See A.I.2.c and A.II.11 below.

2. Additional Terms and Conditions

2.a The permittee shall operate this emissions unit with a regenerative, fume oxidizer (RFO) and scrubber to comply with 40 CFR 63, Subpart DD.

2.b All closed-vent systems, equipment leaks, transfer systems and process vents associated with this emissions unit must comply with the applicable requirements in 40 CFR 63, Subpart DD.

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06, by commiting to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

2.d The MACT contains a provision that allows 240 hours of operation without the RFO during "planned routine maintenance" as defined under 40 CFR 63.693(b)(3)(i). During "planned routine maintenance", this emissions unit is subject to OAC rule 3745-15-06(A)(3).

II. Operational Restrictions

1. HAP (see Table 1 of 40 CFR 63, Subpart DD) contained in the vent stream from P005 shall be destroyed by 95 percent or more, on a total HAP weight-basis.

2. The RFO may be bypassed for the purpose of performing planned routine maintenance of the closed vent system or control device in situations when the routine maintenance can not be performed during periods that the emission point vented to the control device is shutdown.

3. On an annual basis, the total time that the closed-vent system or control device is bypassed to perform routine maintenance shall not exceed 240 hours per each 12 month period.

4. During "planned routine maintenance" in which the RFO is bypassed or shut down, the condenser portion of P005 shall be operated at a temperature no greater than 70 degrees Fahrenheit and OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.

5. The RFO combustion chamber shall be maintained at a minimum residence time of 0.5 second and at a minimum temperature of 1400 degrees Fahrenheit.

6. The permittee shall vent all emissions from this emissions unit to a condenser.

7. During RFO operation, the permittee shall vent all emissions from the RFO to a scrubber.

8. The pH of the scrubber liquor shall be maintained within the range of 6.5 to 10.00.

9. The pressure drop across the scrubber shall be continuously maintained at a range of 1 to 4 inches of water at all times while the emissions unit is in operation.

10. The scrubber water flow rate shall be continuously maintained at a value greater than 300 gallons per minute at all times while the emissions unit is in operation.

11. Permittee shall only burn gas in the RFO and operate this control device with a low-NOx burner.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for P005:

   a. the total number of hours that emissions were vented to the RFO while the RFO was in operation;
   b. the total number of hours that emissions bypassed the RFO or were vented to the RFO while the RFO was not in operation;
   c. the material feed rate in pounds per hour for the day;
   d. the controlled hourly OC emission rate calculated by multiplying the maximum material feed rate (highest hourly value from term A.III.1.c for the day), in pounds per hour, and maximum percent of recoverable solvent (80%) by the AP-42 (2/80 Table 4.7-1 (Solvent Reclaiming) emission factor for a condenser vent of 3.3 lbs OC/ton solvent recovered, multiplying by the RFO destruction efficiency (1-0.972), and dividing by 2000 lbs/ton and 100;
   e. the hourly OC emission rate from the condenser when bypassing the RFO calculated by multiplying the maximum feed rate (highest hourly value from term A.III.1.c for the day), in pounds per hour, and maximum percent of recoverable solvent (80%) by the AP-42 (2/80 Table 4.7-1 (Solvent Reclaiming) emission factor for a condenser vent of 3.3 lbs OC/ton solvent recovered, and dividing by 2000 lbs/ton and 100;

   f. the controlled daily OC emission rate calculated by multiplying the maximum material feed rate (highest hourly value from term A.III.1.c for the day), in pounds per hour, and maximum percent of recoverable solvent (80%) by the AP-42 (2/80 Table 4.7-1 (Solvent Reclaiming) emission factor for a condenser vent of 3.3 lbs OC/ton solvent recovered, by the RFO destruction efficiency (1-0.972) and by the total number of hours that emissions

were vented to the RFO while the RFO was in operation (from term A.III.1.a), and then dividing by 2000 lbs/ton and 100

g. the daily emission rate from the condenser when bypassing the RFO calculated by multiplying the maximum feed rate (highest hourly value from term A.III.1.c for the day), in pounds per hour, and maximum percent of recoverable solvent (80%) by the AP-42 (2/80 Table 4.7-1 (Solvent Reclaiming) emission factor for a condenser vent of 3.3 lbs OC/ton solvent recovered, dividing by 2000 lbs/ton and 100 and multiplying by the total number of hours that emissions bypassed the RFO or were vented to the RFO was not in operation (from term A.III.1.b);

h. the total daily OC emission rate calculated as the sum of the OC emission rates from terms A.III.1.f and A.III.1.g;

i. the RFO controlled hourly OC emission rate, in pounds per hour, calculated as A.III.f divided by the sum of A.III.1.a plus A.III.1.b; and

j. the average hourly OC emission rate, in pounds per hour, calculated as A.III.h divided by the sum of A.III.1.a plus A.III.1.b.

2. The permittee shall maintain records of the annual organic compound emissions by summing the daily emissions (calculated in A.III.1.h) for the calendar year.

3. During "planned routine maintenance", the permittee shall collect and record the following information each day:

   a. the average temperature of the exhaust gases from the condenser during each 3-hour block of time during the day; and

   b. log or record of downtime for the capture (collection) system, control device and the associated emissions unit.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RFO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording 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 the following information for each day:

   a. the combustion temperature within the RFO, when P005 was in operation, on an hourly basis;

   b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and

   c. a log of the bypass time for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

5. The permittee shall properly install, operate and maintain equipment to continuously monitor and display the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor 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 pH of the scrubber liquor, when the RFO was in operation,

b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

6. The permittee shall properly install, operate and maintain equipment to monitor water flow rate while the emissions unit is in operation. The monitoring device 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 water flow rate, in gpm, on a hourly basis.

b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

7. Per 40 CFR 63.696(g), the permittee shall record the following information for "planned routine maintenance" operations that would require the RFO not to meet the requirements of 40 CFR 63.693(f) [A.II.1 and A.II.5]:

a. a description of the "planned routine maintenance" that is anticipated to be performed for the RFO and scrubber during the next six months; the description will include the type of maintenance necessary, planned frequency of maintenance and lengths of maintenance periods;

b. a description of the "planned routine maintenance" that was performed for the RFO during the previous six months; the description will include the type of maintenance performed and the total number of hours during these 6 months that the control device did not meet the requirements of A.II.1 and A.II.5, as applicable, due to "planned routine maintenance".

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This report shall be submitted by January 31 of each year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following parameters were not maintained at or above the required levels:

a. The scrubber liqour pH.
b. The static pressure drop across the scrubber.
c. The scrubber water flow rate.

3. The permittee shall submit quarterly deviation (excursion) reports which identify any hour in which the combustion temperature within the RFO does not comply with the temperature limitation specified above.

4. The permittee shall submit quarterly deviation (excursion) reports which identify an exceedance of the allowable downtime hours of the RFO to comply with 40 CFR 63, Subpart DD.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the RFO.

6. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

V. Testing Requirements

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

   a. Emission Limitation:
   95 percent destruction efficiency for HAPs on a total HAP weight-basis

   Applicable Compliance Demonstration:
   Compliance shall be based on emission testing performed in accordance with 40 CFR 63, Subpart DD specifications in section 63.694, Testing Methods and Procedures.

   During the testing specified above, the permittee shall determine the average condenser operating temperature.

   b. Emission Limitation:
   Organic compound emissions shall not exceed 1.51 pounds per hour.

   Applicable Compliance Method:
   Compliance with the hourly limitation may be demonstrated based on the record keeping on term A.III.1.i. If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 4 and 18, 25 or 25A, as appropriate.

   c. Emission Limitation:

Organic compound emissions shall not exceed 6.6 tons per year.

Applicable Compliance Method:
Compliance with the annual limit shall be demonstrated based on the record keeping in term A.III.2.

d. Emission Limitation:
Hydrogen chloride emissions shall not exceed 0.44 pound per hour and 1.9 tons per year.

Applicable Compliance Method:
Compliance with the hourly limitation will be demonstrated through a stack test. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitation for HCl.

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Method 26. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Central District Office.

Compliance with the annual limit shall be demonstrated by multiplying the pound per hour emission rate established during the compliance test mentioned above by 8760 hours of operation and dividing by 2000 pounds per ton.

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

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

the emissions unit and/or the performance of the control equipment.

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Safety-Therm #1: rotary vacuum dryer with condenser located upstream of a regenerative fume oxidizer and wet scrubber	Air Toxics Policy	

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P005) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: methylene chloride
   TLV (mg/m3): 173

Emissions Unit ID: **P005**

Maximum Hourly Emission Rate (lb/hr): 13.7 (uncontrolled - prior to BAT)
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3670
MAGLC (ug/m3): 4119

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None