State of Ohio Environmental Protection Agency

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

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: 01-12000
Fac ID: 0145020280
DATE: 1/26/2006

Organic Technologies
Mark Westbrook
1780 Tamarack Road
Newark, OH 43055

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 1/26/2006**
Terms and Conditions **Effective Date: 1/26/2006**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-12000

Application Number:	01-12000
Facility ID:	0145020280
Permit Fee:	**$0**
Name of Facility:	Organic Technologies
Person to Contact:	Mark Westbrook
Address:	1780 Tamarack Road Newark, OH 43055

Location of proposed air contaminant source(s) [emissions unit(s)]:
1780 Tamarack Rd
Newark, **Ohio**

Description of proposed emissions unit(s):
Boiler.

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

Joseph P. Koncelik

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.

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

Pollutant	Tons Per Year
NOx	10.1
CO	2.1
SO2	14.4
PE	1.8
OC	0.3

PART II - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
B001 - 5.9 Million Btu/hr Cleaver Brooks Boiler Fired with Natural Gas/Fuel Oil/ Alternative Fuel (Terms in this permit supercede those identified in PTI 01-08887 issued 09/09/04, PTI 01-12000, issued 12/15/05, and PTI 01-12000m1, issued 01/17/06).	OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(A)(1)	Applicable Emissions <u>Limitations/Control Measures</u>	See Section A.2.c below.
OAC rule 3745-17-10(C)(1)	Emissions shall not exceed:	See Section A.2.d below.
OAC rule 3745-18-06	2.30 pounds per hour (lbs/hr) and 10.1 tons per year (tons/yr) nitrogen oxides (NOx);	
OAC rule 3745-21-08(B)	0.48 lb/hr and 2.1 tons/yr carbon monoxide (CO);	
OAC rule 3745-23-06(B)	3.28 lbs/hr and 14.4 tons/yr sulfur dioxide (SO_2);	
	0.42 lb/hr and 1.8 tons/yr particulate emissions (PE); and	
	0.06 lb/hr and 0.3 ton/yr organic compounds (OC).	
	Visible particulate emissions shall not exceed 10% opacity as a six-minute average.	
	See Section A.2.a and A.2.e below.	
	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B) and 3745-23-06(B)	
	The emission limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).	
	Exempt. See Section A.2.b below.	

2. Additional Terms and Conditions

2.a All fuel oil/alternative fuels burned in this emissions unit shall have a sulfur content equal to or less than 0.5% by weight. Fuel nitrogen, metals, and HAP content shall be no greater than is typical for natural gas, LPG, or #2 fuel oil.

2.b This emissions unit is exempt from the requirements of OAC rule 3745-18-06(D) pursuant to OAC rule 3745-18-06(B).

2.c The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(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 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.d 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 14, 2005, OAC rule 3745-23-06 was rescinded; 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 U.S. EPA approves the revision, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.e The emissions associated with firing natural gas, #2 fuel oil, biofuels, and LP co-product fuels were evaluated for this permit to install. The permittee is not precluded from burning other fuels in this emissions unit; however, before the permittee utilizes other fuels in this emissions unit, an evaluation of the new emissions must be conducted to determine if a modification as defined in OAC Chapter 3745-31 has been triggered. See Section D.3. below for notification

requirements.

B. Operational Restrictions

1. The permittee shall only burn natural gas, fuel oil, or biofuels and other alternative fuels that comply with all requirements of this permit in this emissions unit. The physical characteristics and fuel quality of the biofuels are similar to number two fuel oil. Therefore, emission factors for NOx, CO, OC and total HAPs are deemed to be the same as the AP-42 emission factors for number two fuel oil combustion for these pollutants. The physical characteristics and fuel quality of the LP co-product fuels are similar to LPG. Therefore, emission factors for NOx, CO, OC and total HAPs are deemed to be the same as the AP-42 emission factors for LPG combustion for these pollutants.

C. Monitoring and/or Recordkeeping Requirements

1. For each shipment of fuel oil received for burning in this emissions unit, the permittee shall maintain monthly records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content (% by weight).

2. For each alternative fuel burned in this emissions unit, the permittee shall maintain monthly records of the quantity burned and the sulfur content (% by weight).

3. For each day during which the permittee burns a fuel other than natural gas, fuel oil, or complying alternative fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any record which shows an exceedance of the sulfur content limit specified in Section A.2.a above. The notification shall include a copy of such record and shall be sent within 30 days after the deviation occurs.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, fuel oil, or complying alternative fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall provide written notification to the Ohio EPA, Central District Office

prior to burning any new fuel(s) in this emissions unit. The notification shall include documentation that the new fuel(s) to be burned do not trigger an OAC Chapter 3745-31 modification. If the emissions associated with burning the new fuel(s) constitute an OAC Chapter 3745-31 modification, the permittee shall obtain a modified permit to install prior to utilizing the new fuel(s) in this emissions unit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation
   NOx emissions shall not exceed 2.30 lbs/hr and 10.1 tons/yr.

   Applicable Compliance Method
   Compliance with the hourly emission limitation shall be demonstrated by multiplying the emission factor (55 lbs/1000 gallons) from AP-42, Table 1.3-1, 9/98, by the maximum hourly fuel usage of this emissions unit (41.8 gallons/hr). Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr, and dividing by 2000 lbs/ton.

   If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

   b. Emission Limitation
   CO emissions shall not exceed 0.48 lb/hr and 2.1 tons/yr.

   Applicable Compliance Method
   Compliance with the hourly emission limitation shall be demonstrated by multiplying the emission factor (84 lb/million ft^3) from AP-42, Table 1.4-1, 7/98, by the maximum hourly natural gas usage of this emissions unit (5743 ft^3/hr). Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr, and dividing by 2000 lbs/ton.

   If required, the permittee shall demonstrate compliance with hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

   c. Emission Limitation
   SO_2 emissions shall not exceed 3.28 lbs/hr and 14.4 tons/yr.

   Applicable Compliance Method
   Compliance with the hourly emission limitation shall be demonstrated by multiplying the emission factor (157S lb/1000 gallons, where S is the fuel sulfur content) from AP-42, Table 1.3-1, 9/98, by the maximum hourly fuel usage of this

emissions unit (41.8 gallons/hr). Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr, and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

d. Emission Limitation
PE shall not exceed 0.42 lb/hr and 1.8 tons/yr.

Applicable Compliance Method
Compliance with the hourly emission limitation shall be demonstrated by multiplying the emission factor (10 lbs/1000 gallons) from AP-42, Table 1.3-1, 9/98, by the maximum hourly fuel usage of this emissions unit (41.8 gallons/hr). Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr, and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 5 of 40 CFR Part 60, Appendix A.

e. Emission Limitation
OC emissions shall not exceed 0.06 lb/hr and 0.3 ton/yr.

Applicable Compliance Method
Compliance with the hourly emission limitation shall be demonstrated by multiplying the emission factor (11 lb/million ft^3) from AP-42, Table 1.4-2, 7/98, by the maximum hourly natural gas usage of this emissions unit (5743 ft^3/hr). Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr, and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 25 of 40 CFR Part 60, Appendix A.

f. Emission Limitation
Visible particulate emissions shall not exceed 10% opacity as a six-minute average, except as provided by rule.

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.