



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
UNION COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 01-07992**

**DATE: 10/25/2001**

The Scotts Co  
Gary Daugherty  
14111 Scottslawn Rd  
Marysville, OH 43026

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

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: To be entered upon final issuance

**DRAFT MODIFICATION OF PERMIT TO INSTALL 01-07992**

Application Number: 01-07992  
APS Premise Number: 0180010008  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: The Scotts Co  
Person to Contact: Gary Daugherty  
Address: 14111 Scottslawn Rd  
Marysville, OH 43026

Location of proposed air contaminant source(s) [emissions unit(s)]:

**14111 Scottslawn Rd  
Marysville, Ohio**

Description of proposed emissions unit(s):

**Fertilizer mixing line.**

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

The Scotts Co

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PTI Application: 01-07992

Issued: To be entered upon final issuance

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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the 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.

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- 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

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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

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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.

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**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.

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**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**

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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).

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**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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	103.60
PM <sub>10</sub>	93.74
CO	3.5
NO <sub>x</sub>	4.2
OC	6.60
NH <sub>3</sub> (Ammonia)	1752.00

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**Part II -Facility Specific Terms and Conditions**

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

1. This emissions unit, as described in this Permit to Install (PTI), is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U.S. EPA). The authority to apply and enforce the PSD regulations has been delegated to Ohio EPA.

In accordance with 40 CFR 124.15, 124.19, and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors the final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. If an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United State Environmental Protection Agency  
Environmental Appeals Board  
401 M Street, SW (MC-113do)  
Washington, DC 21460

This permit condition applies to the following emission units:  
P036 through P066.

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

1. Emissions/Operational limitations and Air Toxics Impacts Analysis

The PTI application for this permit for the System 2 granulation drum and cooler (P036), System 3 granulation drum and process cooler (P040), System 4 granulation drum and process cooler (P049), Specialty System granulation drum and process cooler (P058), System 3 resin reactors (P037, P038, P039), System 4 resin reactors (P047, P048 ) and Specialty System resin reactors (P056, P057) was evaluated based upon the raw materials usages and design parameters of the proposed operations exhaust systems.

An "Air Toxic Policy" analysis was performed, using the ISCST3 model, and submitted to the Ohio EPA, DAPC on May 5, 1999 demonstrating a "Net Air Quality Improvement" from the proposed project for proposed NH3 emissions. Maximum NH3 emissions modeled were as follows:

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Egress Point A12/System 4 Granulation Drum (P049)- 4.0 lbs/hr  
Egress Point A13/System 4 Cooler (P049)- 16.0 lbs/hr  
Egress Point A2/Specialty System Granulation Drum (P058)-4.0 lbs/hr  
Egress Point A3/Specialty System Cooler (P058)- 16.0 lbs/hr  
Egress Point A7/Specialty System Reactors #1 and #2 (P056 and P057)- 84.0 lbs/hr  
Egress Point EST-14/System 2 Granulation Drum (P036)- 78.0 lbs/hr  
Egress Point EST-68/System 2 Process Cooler (P036)- 10.0 lbs/hr  
Egress Point SYSRR03/System 3 & System 4 Reactors (P037-P039, P047 & P048)- 168.0 lbs/hr  
Egress Point SYSGRAN03/System 3 Granulation Drum (P040)- 4.0 lbs/hr  
Egress Point SYSPC03/System 3 Cooler (P040)- 16.0 lbs/hr

Physical changes to or changes in the method of operation of the emissions units 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, using methods consistent with the original analysis unless otherwise approved by Ohio EPA, to determine that the "Air Toxic Policy" will still be 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 which include the following:

- a. changes in the composition of raw materials, or the use new raw materials, that would result in the emission of a new 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, changes in temperature for either the resin reactor(s) or process coolers(s) or the granulation drum(s), etc.).

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.

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2. Monitoring and/or Record Keeping Requirements

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, changes in temperature for either the resin reactor(s) or process coolers(s) or the granulation drum(s), 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 modeling runs that show the results of the application of the "Air Toxic Policy" for the change.

3. Reporting Requirements

None.

4. Testing Requirements

Note: Emissions testing demonstrating maximum hourly NH<sub>3</sub> emissions do not exceed the above modeled hourly rates was performed (and witnessed by Ohio EPA staff) on the System 2 Granulation Drum and Cooler (P036) in 1998 and the System 3 Granulation Drum and Cooler (P040) in 1999. This permit will only increase annual production rates and annual emissions for these units.

The permittee shall conduct, or have conducted, NH<sub>3</sub> emissions testing for the System 3 and System 4 resin reactors egress point (SYSRR03), System 4 granulation drum and cooler (P049), Specialty System granulation drum and cooler (P058) and Specialty System Resin Reactors (P056 and P057) in accordance with the following:

- a. The emissions testing shall be conducted within 180 days of startup of each unit.
- b. The testing shall be conducted to demonstrate maximum hourly emissions do not exceed the above-referenced modeled ammonia emissions from each egress point;
- c. Methods 1-4 and Modified Method 5 or alternative test methods approved by Ohio EPA shall be employed to demonstrate the maximum hourly emissions rates; and,
- d. The tests shall be conducted with units operating at, or near, maximum operating capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air

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agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

5. Miscellaneous Requirements

- a. Modeling to demonstrate compliance with the Ohio EPA Air Toxics Policy, due to the increase in NH<sub>3</sub> emissions from this new project, was performed. It was shown that a Net Air Quality Improvement will be realized, as a result of emissions decreases at the plant which were included in the modeling.

**Part III - Special Terms and Conditions for Specific Emissions Unit(s)**

**A. State and Federally Enforceable Section**

**IV. 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>	
P036- System 2 Granulation Drum and Process Cooler w/fabric filters (50,000 lbs/hr maximum)  (Modification)	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-21-08(B)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)
	OAC rule 3745-23-06(B)	

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Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

NH<sub>3</sub> emissions shall not exceed 88.0 lbs/hour.

Particulate emissions shall not exceed 1.83 pounds per hour and 8.02 tons per year.

Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 1.36 pounds per hour and 5.9 tons per year.

NO<sub>x</sub> emissions shall not exceed 0.09 pounds per hour and 0.40 tons per year. See A.II.2. below.

CO emissions shall not exceed 0.02 pounds per hour and 0.09 tons per year. See A.II.2. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

The emissions limitation specified by this rule is less stringent than the

emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install fabric filters to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from each fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II Operational Restrictions**

1. The pressure drop across the fabric filter shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.
2. The permittee shall burn only natural gas or LPG in this emissions unit.
3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

**II Monitoring and/or Recordkeeping Requirements**

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
2. This facility shall install, operate and maintain equipment to monitor the pressure drop across each permanent or temporary draft opening(s) in the enclosure that is open during operation of the facility while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated,

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operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each permanent or temporary draft opening(s) in the enclosure at least once per each operating shift of the emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the fabric filters did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM10, and permanent total enclosure:

Particulate emissions shall not exceed 1.83 pounds per hour and 8.02 tons per year. PM10 emissions shall not exceed 1.36 pounds per hour and 5.9 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after the issuance of this permit, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

**Issued: To be entered upon final issuance**

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Methods 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**Emissions Limitation:**

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NOx emissions shall not exceed 0.09 lb/hr and 0.40 tons per year.

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance for the NO<sub>x</sub> emission limits be based upon an emission factor of 100 lb No<sub>x</sub>/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 850 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.002 lb/hr and 0.09 ton/yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 850 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress points EST14, and EST68 are equal to or less than the emissions limit for this emissions unit.

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P036- System 2 Granulation Drum and Process Cooler w/fabric filters (50,000 lbs/hr maximum)	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

**Issued: To be entered upon final issuance**  
None

Emissions Unit ID: **P036**

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P037-System 3 resin reactor #1 w/wet scrubber  (Modification)	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	See A.I.2. below for Best Available Control Technology (BACT) determination.
	OAC Rule 3745-31-05(A)(3)	NH3 emissions shall not exceed 20.3 lbs/hour.  Particulate emissions shall not exceed 0.15 pounds per hour and 0.65 tons per year.
	OAC rule 3745-17-07(A)(1)	Particulate emissions less than 10 microns (PM10) shall not exceed 0.15 pounds per hour and 0.65 tons per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.
	OAC rule 3745-17-11(B)	Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.  The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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Emissions Unit ID: **P037**

**Issued: To be entered upon final issuance**

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a wet scrubber to control of PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the wet scrubber shall not exceed 0.01 grain/scf.

**II. Operational Restrictions**

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 0.15 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while the emissions units are in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, inspect, and maintain equipment to monitor the pressure drop across the wet scrubber and water flow rate through the wet scrubber while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the wet scrubber and the water flow rate through the wet scrubber on a per shift basis.
2. The per shift records shall include the shift, the time, the date the monitoring is performed, the Ohio EPA Source ID number, the company's control unit ID number, the person's name performing the monitoring, and actual measured pressure drop in inches of water column across the wet scrubber and the actual measured gallons of water per minute through the wet scrubber.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify each period of time during which the pressure drop across the wet scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit water flow rate deviation (excursion) reports that identify each period of time during which the water flow rate through the scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

Emissions Unit ID: **P037**

**Issued: To be entered upon final issuance**

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

**Issued: To be entered upon final issuance**

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.15 pounds per hour and 0.65 tons per year. PM10 emissions shall not exceed 0.15 pounds per hour and 0.65 tons per year. Emissions from the wet scrubber shall not exceed 0.01 grain/scf.

Applicable Compliance Method:

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999. The emissions test showed compliance with the emissions limitations for this emissions unit.

If required, compliance shall be demonstrated through emissions testing using the following test methods:  
for particulate, methods 1-4 and; Method 5 of 40 CFR Part 60, Appendix A; for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation for NH<sub>3</sub>:

Emissions shall not exceed 20.3 lbs/hr.

Applicable Compliance Method:

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable requirements in section Part II(B)(4) of this permit.

**VI. Miscellaneous Requirements**

1. For the purpose of demonstrating compliance with the allowable emissions limits, the sum of the allowable limits for all units vented to the control system during the compliance demonstration shall be utilized for comparison against the measured emissions.

Emissions Unit ID: P037

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P037-System 3 resin reactor #1 w/wet scrubber	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P038-System 3 resin reactor #2 w/wet scrubber	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	See A.I.2. below for Best Available Control Technology (BACT) determination.
(Modification)	OAC Rule 3745-31-05(A)(3)	NH3 emissions shall not exceed 20.3 lbs/hour.
		Particulate emissions shall not exceed 0.15 pounds per hour and 0.65 tons per year.
		Particulate emissions less than 10 microns (PM10) shall not exceed 0.15 pounds per hour and 0.65 tons per year.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.
	OAC rule 3745-17-11(B)	Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.
		The emissions limitation specified by this

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rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

**2. Additional Terms and Conditions**

**2.a** Pursuant to 40 CFR 52.21, the permittee shall install a wet scrubber to control of PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the wet scrubber shall not exceed 0.01 grain/scf.

**II. Operational Restrictions**

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 0.15 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while the emissions units are in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, inspect, and maintain equipment to monitor the pressure drop across the wet scrubber and water flow rate through the wet scrubber while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the wet scrubber and the water flow rate through the wet scrubber on a per shift basis.
2. The per shift records shall include the shift, the time, the date the monitoring is performed, the Ohio EPA Source ID number, the company's control unit ID number, the person's name performing the monitoring, and actual measured pressure drop in inches of water column across the wet scrubber and the actual measured gallons of water per minute through the wet scrubber.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify each period of time during which the pressure drop across the wet scrubber did not comply with the allowable

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range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

2. The permittee shall submit water flow rate deviation (excursion) reports that identify each period of time during which the water flow rate through the scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

## **V. Testing Requirements**

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

**Issued: To be entered upon final issuance**

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.15 pounds per hour and 0.65 tons per year. PM10 emissions shall not exceed 0.15 pounds per hour and 0.65 tons per year. Emissions from the wet scrubber shall not exceed 0.01 grain/scf.

Applicable Compliance Method:

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999. The emissions test showed compliance with the emissions limitations for this emissions unit.

If required, compliance shall be demonstrated through emissions testing using the following test methods: for particulate, Methods 1-4 and; Method 5 of 40 CFR Part 60, Appendix A; for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation for NH<sub>3</sub>:

Emissions shall not exceed 20.3 lbs/hr.

Applicable Compliance Method:

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable requirements in section Part II(B)(4) of this permit.

**VI. Miscellaneous Requirements**

1. For the purpose of demonstrating compliance with the allowable emissions limits, the sum of the allowable limits for all units vented to the control system during the compliance demonstration shall be utilized for comparison against the measured emissions.

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P038-System 3 resin reactor #2 w/wet scrubber	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**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**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P039-System 3 resin reactor #3 w/wet scrubber	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	See A.I.2. below for Best Available Control Technology (BACT) determination.
(Modification)	OAC Rule 3745-31-05(A)(3)	NH3 emissions shall not exceed 42.4 lbs/hour.
		Particulate emissions shall not exceed 0.14 pounds per hour and 0.64 tons per year.
		Particulate emissions less than 10 microns (PM10) shall not exceed 0.14 pounds per hour and 0.64 tons per year.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.
	OAC rule 3745-17-11(B)	Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.
		The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a wet scrubber to control of PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the wet scrubber shall not exceed 0.01 grain/scf.

**II. Operational Restrictions**

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 0.15 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while the emissions units are in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, inspect, and maintain equipment to monitor the pressure drop across the wet scrubber and water flow rate through the wet scrubber while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the wet scrubber and the water flow rate through the wet scrubber on a per shift basis.
2. The per shift records shall include the shift, the time, the date the monitoring is performed, the Ohio EPA Source ID number, the company's control unit ID number, the person's name performing the monitoring, and actual measured pressure drop in inches of water column across the wet scrubber and the actual measured gallons of water per minute through the wet scrubber.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify each period of time during which the pressure drop across the wet scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit water flow rate deviation (excursion) reports that identify each period of time during which the water flow rate through the scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

**Issued: To be entered upon final issuance**

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.14 pounds per hour and 0.64 tons per year. PM10 emissions shall not exceed 0.14 pounds per hour and 0.64 tons per year. Emissions from the wet scrubber shall not exceed 0.01 grain/scf.

Applicable Compliance Method:

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999. The emissions test showed compliance with the emissions limitations for this emissions unit.

If required, compliance shall be demonstrated through emissions testing using the following test methods: for particulate, Methods 1-4 and; Method 5 of 40 CFR Part 60, Appendix A; for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation for NH<sub>3</sub>:

Emissions shall not exceed 42.4 lbs/hr.

Applicable Compliance Method:

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable requirements in section Part II(B)(4) of this permit.

**VI. Miscellaneous Requirements**

1. For the purpose of demonstrating compliance with the allowable emissions limits, the sum of the allowable limits for all units vented to the control system during the compliance demonstration shall be utilized for comparison against the measured emissions.

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P039-System 3 resin reactor #3 w/wet scrubber	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P040- System3 Granulation Drum and Process Cooler w/fabric filters (60,000 lbs/hr maximum)	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-23-06(B)
(Modification)		OAC rule 3745-21-08(B)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)

Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

NH<sub>3</sub> emissions shall not exceed 20.0 lbs/hour.

Particulate emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year.

Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 3.03 pounds per hour and 13.3 tons per year.

NO<sub>x</sub> emissions shall not exceed 0.09 pounds per hour and 0.40 tons per year. See A.II.2. below.

CO emissions shall not exceed 0.02 pounds per hour and 0.09 tons per year. See A.II.2. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule

3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and 3745-31-10 through 20.

**Issued: To be entered upon final issuance**

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install fabric filters to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from each fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filters shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.
- 2. The permittee shall burn only natural gas or LPG in this emissions unit.
- 3. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

**Issued: To be entered upon final issuance**

2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the fabric filters did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

Emissions Limitations for particulate, PM10, and permanent total enclosure:

Particulate emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year. PM10 emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year. Emissions from the fabric filter shall not exceed 0.005 grain/scf. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999. The emissions test showed compliance with the emissions limitations for this emissions unit.

If required, compliance shall be demonstrated through emissions testing using the following test

Emissions Unit ID: **P040**

methods: for particulate, Method 1-4 and; Method 5 of 40 CFR Part 60, Appendix A; for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**Emission Limitation:**

There shall be no fugitive emissions escaping from the building housing this emissions unit.

**Applicable Compliance Method:**

To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

Emissions Unit ID: **P040**

**Issued: To be entered upon final issuance**

Emissions Limitation:

NOx emissions shall not exceed 0.09 lb/hr and 0.40 tons per year.

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance for the NO<sub>x</sub> emission limits be based upon an emission factor of 100 lb Nox/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 850 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.0.02 lb/hr and 0.09 ton/yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 850 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**VI. Miscellaneous Requirements**

1. For the purpose of demonstrating compliance with the allowable emissions limits, the sum of the allowable limits for all units vented to the control system during the compliance demonstration shall be utilized for comparison against the measured emissions.

Emissions Unit ID: P040

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P040-System 3 Granulation Drum and Process Cooler w/fabric filters (60,000 lbs/hr maximum daily average)	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P041-System 3 milling, screening, elevators and conveyors w/fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	See A.I.2. below for Best Available Control Technology (BACT) determination
(Modification)	OAC Rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 0.51 pound per hour and 2.2 tons per year.
		Particulate emissions less than 10 microns (PM10) shall not exceed 0.51 pound per hour and 2.2 tons per year.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.
	OAC rule 3745-17-11(B)	Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.
		The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10

**Issued: To be entered upon final issuance**  
through 20.

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
- 2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device,

monitoring equipment, and the associated emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM10, and permanent total enclosure:

Particulate emissions shall not exceed 0.51 pounds per hour and 2.2 tons per year. PM10 emissions shall not exceed 0.51 pounds per hour and 2.2 tons per year. Emissions from the fabric filter shall not exceed 0.005 grain/scf. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999. The emissions test showed compliance with the emissions limitations for this emissions unit.

If required, compliance shall be demonstrated through emissions testing using the following test methods: for particulate, Methods 1-4 and; Method 5 of 40 CFR Part 60, Appendix A; for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the

Emissions Unit ID: **P041**

emissions unit operating parameters, the time(s) and date(s) of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

1. This emissions unit shall be deemed in compliance if the total emissions from egress point SYSPC03 is equal to or less than the sum of the emission limits for P040, P041 and P042 minus the total emissions from egress point SYSGRAN03 (which are the emissions from granulation drum, P040).

**Issued: To be entered upon final issuance**

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P041-System 3 milling, screening, elevators and conveyors w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**Issued: To be entered upon final issuance**

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11(B)
P042-System 3 blending with fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	
(Modification)	OAC Rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions  
Limitations/Control  
Measures

3745-31-05(A)(3) and 3745-31-10  
through 20.

See A.I.2. below for Best  
Available Control  
Technology (BACT)  
determination.

Particulate emissions shall  
not exceed 0.22 pound per  
hour and 0.95 ton per year.

Organic compounds  
emissions shall not exceed  
1.5 pounds per hour and  
6.6 tons per year from the  
pesticide melter/mixer  
(P053), System 3 blender  
(P042) and System 4  
blender (P052).

Particulate emissions less  
than 10 microns (PM10)  
shall not exceed 0.22 pound  
per hour and 0.95 ton per  
year.

The requirements of this  
rule also include  
compliance with the  
requirements of OAC rules  
3745-17-07(A)(1) and  
3745-31-10 through 20.

Visible particulate  
emissions shall not exceed  
20% opacity as a 6 minute  
average, except as  
exempted by rule.

The emissions limitation  
specified by this rule is less  
stringent than the emission  
limitation established  
pursuant to OAC rule

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
- 2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

**Issued: To be entered upon final issuance**

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

Emissions Limitations for particulate, PM<sub>10</sub>, and permanent total enclosure:

Particulate emissions shall not exceed 0.22 pound per hour and 0.95 ton per year. PM<sub>10</sub> emissions shall not exceed 0.22 pound per hour and 0.95 ton per year. Emissions from the fabric filter shall not exceed 0.005 grain/scf. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Emissions testing was conducted for this emissions unit on May 19 and 20, 1999. The emissions test showed compliance with the emissions limitations for this emissions unit.

If required, compliance shall be demonstrated through emissions testing using the following test methods: for particulate, Methods 1-4 and; Method 5 of 40 CFR Part 60, Appendix A; for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to

Emissions Unit ID: **P042**

Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**Emissions Limitation:**

Organic compounds emissions shall not exceed 1.5 pounds per hour and 6.6 tons per year from the pesticide melter/mixer (P053), System 3 blender (P042) and System 4 blender (P052).

**Applicable Compliance Method:**

Compliance with this limit is based on previous stack test conducted in similar emissions units at the facility. The permittee conducted stack testing on System 1 and System 2 pesticide melters and blenders. The stack test results were 0.49 pound per hour of organic compounds. If required, the permittee shall conduct stack testing to show compliance with these emissions limitations in accordance to test methods 1-4 and 25A.

## **VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point SYSPC03 is equal to or less than the sum of the emission limits for P040, P041 and P042 minus the total emissions from egress point SYSGRAN03 (which are the emissions from the granulation drum, P040).
2. The permittee shall notify the Ohio EPA, Central District Office, 30 days prior to any

Emissions Unit ID: P042

modification to the blending operation which will cause potential or actual increases in air flow across the raw materials introduced into the blender (P042) above 1,000 CFM.

3. The permittee shall notify the Ohio EPA, Central District Office, 30 days prior to any modification to the blending operation which will cause potential or actual increases in the operating temperature of the blending operation (P042) above 85 degrees Fahrenheit.
4. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees 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 changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P042-System 3 blending w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P043, System 1, 2 and 3 Packaging Operations w/fabric filters	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	See A.I.2. below for Best Available Control Technology (BACT) determination
	OAC Rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 1.54 pounds per hour and 6.8 tons per year.
		Particulate emissions less than 10 microns (PM10) shall not exceed 1.14 pounds per hour and 5.0 tons per year.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.
	OAC rule 3745-17-11(B)	Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.
		The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10

**Issued: To be entered upon final issuance**  
through 20.

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install fabric filters to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1 The pressure drop across each fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
- 2 The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1 This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
- 2 The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device,

monitoring equipment, and the associated emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the three (3) fabric filters did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM10, and permanent total enclosure:

Particulate emissions shall not exceed 1.54 pounds per hour and 6.8 tons per year. Particulate emissions less than 10 microns (PM10) shall not exceed 1.14 pounds per hour and 5.0 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

No later than 90 days after startup of this emissions unit, this facility shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable PM and PM10 emissions limits.

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who

Emissions Unit ID: **P043**

will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

## **VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress points EST25, EST26, EST27 is equal to or less than the emission limits for P043.

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P043, System 1, 2 and 3 Packaging Operations w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

Emissions Unit ID: **P043**

**Issued: To be entered upon final issuance****Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P044 System 4 Mon-A-Mon , Potash & Vermiculite Handling/unl oading w/ fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)(1)	

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 1.4 pounds per hour and 6.1 tons per year;

Fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average;

Particulate emissions less than 10 microns (PM10) shall not exceed 1.1 pounds per hour and 4.6 tons per year (these emissions limits include fugitive emissions);

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation

specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

## 2. Additional Terms and Conditions

- 2.a Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT) that is sufficient to minimize or eliminate visible emissions of fugitive dust. The emissions from the fabric filter shall not exceed 0.005 grain PM/scf.

## II. Operational Restrictions

1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

## V. Testing Requirements

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

**Issued: To be entered upon final issuance**

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 1.4 pounds per hour and 6.1 tons per year; Particulate emissions less than 10 microns (PM10) shall not exceed 1.1 pounds per hour and 4.6 tons per year (these emissions limits include fugitive emissions)

Applicable Compliance Method:

Fugitive PM/PM10 mass emissions determination- Fugitive emissions estimates for this operation shall be based upon an overall 94% capture efficiency and an uncontrolled PM/PM10 emissions factor of 0.2 lb/ton (based on the Ohio EPA RACM document, Figure 2.12.-3) of material handled unless otherwise approved by Ohio EPA.

No later than 90 days after startup of this unit, this facility shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable PM and PM10 emissions limits.

The following test methods shall be employed to demonstrate compliance with the allowable mass emissions rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The emissions testing shall be conducted while the emissions units are operating at or near the maximum capacities, unless otherwise approved by the Ohio EPA.

Not later than 30 days prior to the proposed test dates, the permittee shall submit a completed "Intent To Test" (ITT) to the Ohio EPA Central District Office. The ITT 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 tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA refusal to accept the results of the emissions test.

Personnel from the Ohio EPA shall be permitted to witness the tests, 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 Ohio EPA Central District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

Emissions Limitation:

Emissions Unit ID: **P044**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule and fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average.

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Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A9 is equal to or less than 1.0 pound of PM10 per hour.

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- 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	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P044      System      4 Mon-A-Mon , Potash & Vermiculite Handling/unl oading w/ fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

Emissions Unit ID: **P044**

**Issued: To be entered upon final issuance**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P045 System 4 raw material unloading/handling w/fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)(1)	

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 1.0 pound per hour and 4.4 tons per year;

Fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average;

Particulate emissions less than 10 microns (PM10) shall not exceed 0.9 pound per hour and 3.9 tons per year (these emissions limits include fugitive emissions);

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation

specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

## 2. Additional Terms and Conditions

- 2.a Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT) that is sufficient to minimize or eliminate visible emissions of fugitive dust. The emissions from the fabric filter shall not exceed 0.005 grain PM/scf.

## II. Operational Restrictions

1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

## V. Testing Requirements

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

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 1.0 pound per hour and 4.4 tons per year; Particulate emissions less than 10 microns (PM10) shall not exceed 0.9 pound per hour and 3.9 tons per year (these emissions limits include fugitive emissions);

Applicable Compliance Method:

Fugitive PM/PM10 mass emissions determination- Fugitive emissions estimates for this operation shall be based upon an overall 94% capture efficiency and an uncontrolled PM/PM10 emissions factor of 0.2 lb/ton (based on the Ohio EPA RACM document, Figure 2.12.-3) of material handled unless otherwise approved by Ohio EPA.

**Issued: To be entered upon final issuance**

No later than 90 days of startup of this unit, this facility shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable PM and PM10 emissions limits.

The following test methods shall be employed to demonstrate compliance with the allowable mass emissions rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The emissions testing shall be conducted while the emissions units are operating at or near the maximum capacities, unless otherwise approved by the Ohio EPA.

Not later than 30 days prior to the proposed test dates, the permittee shall submit a completed "Intent To Test" (ITT) to the Ohio EPA Central District Office. The ITT 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 tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA refusal to accept the results of the emissions test.

Personnel from the Ohio EPA shall be permitted to witness the tests, 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 Ohio EPA Central District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule and fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A11 is

**The Scotts Co**

**DTI Application: 01 07002**

**Facility ID: 0180010008**

Emissions Unit ID: **P045**

equal to or less than 0.32 pound of PM10 per hour.

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P045 System 4 raw material unloading/handling w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P046 System 4 Urea Handling/Unloading w/fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)(1)	

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.25 pound per hour and 1.1 ton per year;

Fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average;

Particulate emissions less than 10 microns (PM10) shall not exceed 0.19 pound per hour and 0.8 ton per year (these emissions limits include fugitive emissions);

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation

specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

**Issued: To be entered upon final issuance**

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT) that is sufficient to minimize or eliminate visible emissions of fugitive dust. The emissions from the fabric filter shall not exceed 0.005 grain PM/scf.

**II. Operational Restrictions**

1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.25 pound per hour and 1.1 tons per year; Particulate emissions less than 10 microns (PM10) shall not exceed 0.19 pound per hour and 0.8 ton per year (these emissions limits include fugitive emissions);

Applicable Compliance Method:

Fugitive PM/PM10 mass emissions determination- Fugitive emissions estimates for this operation shall be based upon an overall 94% capture efficiency and an uncontrolled emissions factors of 0.02 lb PM/ton and 0.017 lb PM10/ton (both based on FIRE v6.01/SCC 301040007) of material

Emissions Unit ID: P046

handled unless otherwise approved by Ohio EPA.

No later than 90 days after startup of this unit, this facility shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable PM and PM10 emissions limits.

The following test methods shall be employed to demonstrate compliance with the allowable mass emissions rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The emissions testing shall be conducted while the emissions units are operating at or near the maximum capacities, unless otherwise approved by the Ohio EPA.

Not later than 30 days prior to the proposed test dates, the permittee shall submit a completed "Intent To Test" (ITT) to the Ohio EPA Central District Office. The ITT 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 tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA refusal to accept the results of the emissions test.

Personnel from the Ohio EPA shall be permitted to witness the tests, 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 Ohio EPA Central District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule and fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

## **VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A10 is equal to or less than 0.17 pound of PM10 per hour.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 System 4 Urea Handling/Unloading w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 System 4 resin reactor #1 w/wet scrubber	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	See A.I.2. below for Best Available Control Technology (BACT) determination.  NH3 emissions shall not exceed 42.5 lbs/hour.  Particulate emissions shall not exceed 0.22 pounds per hour and 0.96 tons per year.  Particulate emissions less than 10 microns (PM10) shall not exceed 0.22 pounds per hour and 0.96 tons per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.  Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.  The emissions limitation specified by this
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(B)	

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rule is less stringent than  
the emission limitation  
established pursuant to  
OAC rules  
3745-31-05(A)(3) and  
3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a wet scrubber to control of PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the wet scrubber shall not exceed 0.01 grain/scf.

**II. Operational Restrictions**

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 0.15 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while the emissions units are in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, inspect, and maintain equipment to monitor the pressure drop across the wet scrubber and water flow rate through the wet scrubber while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the wet scrubber and the water flow rate through the wet scrubber on a per shift basis.
2. The per shift records shall include the shift, the time, the date the monitoring is performed, the Ohio EPA Source ID number, the company's control unit ID number, the person's name performing the monitoring, and actual measured pressure drop in inches of water column across the wet scrubber and the actual measured gallons of water per minute through the wet scrubber.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify each period of time during which the pressure drop across the wet scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit water flow rate deviation (excursion) reports that identify each period of time during which the water flow rate through the scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

**The Scotts Co**

**DTI Application: 01 07002**

**Facility ID: 0180010008**

Emissions Unit ID: **P047**

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

**Issued: To be entered upon final issuance**

Emissions Limitations for particulate and PM<sub>10</sub>:

Particulate emissions shall not exceed 0.22 pounds per hour and 0.96 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.22 pounds per hour and 0.96 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and PM<sub>10</sub>. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written

Emissions Unit ID: **P047**

**Issued: To be entered upon final issuance**

report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

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Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation for NH<sub>3</sub>:

Emissions shall not exceed 42.5 lbs/hr.

Applicable Compliance Method:

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable facility-wide requirements in Part II(B)(4) of this permit.

**VI. Miscellaneous Requirements**

1. For the purpose of demonstrating compliance with the allowable emissions limits, the sum of the allowable limits for all units vented to the control system during the compliance demonstration shall be utilized for comparison against the measured emissions.

Emissions Unit ID: P047

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 System 4 resin reactor #1 w/wet scrubber	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P048 System 4 resin reactor #2 w/wet scrubber	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)(1)	

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Applicable Emissions  
Limitations/Control  
Measures

pursuant to OAC rules  
3745-31-05(A)(3) and 3745-31-10  
through 20.

See A.I.2. below for Best Available Control Technology (BACT) determination.

NH<sub>3</sub> emissions shall not exceed 42.5 lbs/hour.

Particulate emissions shall not exceed 0.22 pounds per hour and 0.96 tons per year.

Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.22 pounds per hour and 0.96 tons per year.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established

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Emissions Unit ID: **P048**

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a wet scrubber to control of PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the wet scrubber shall not exceed 0.01 grain/scf.

**II. Operational Restrictions**

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 0.15 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 110 gallons per minute at all times while the emissions units are in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, inspect, and maintain equipment to monitor the pressure drop across the wet scrubber and water flow rate through the wet scrubber while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the wet scrubber and the water flow rate through the wet scrubber on a per shift basis.
2. The per shift records shall include the shift, the time, the date the monitoring is performed, the Ohio EPA Source ID number, the company's control unit ID number, the person's name performing the monitoring, and actual measured pressure drop in inches of water column across the wet scrubber and the actual measured gallons of water per minute through the wet scrubber.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify each period of time during which the pressure drop across the wet scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit water flow rate deviation (excursion) reports that identify each period of time during which the water flow rate through the scrubber did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

**The Scotts Co**

**DTI Application: 01 07002**

**Facility ID: 0180010008**

Emissions Unit ID: **P048**

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

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Emissions Limitations for particulate and PM<sub>10</sub>:

Particulate emissions shall not exceed 0.22 pounds per hour and 0.96 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.22 pounds per hour and 0.96 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and PM<sub>10</sub>. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA

Emissions Unit ID: **P048**

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District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

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Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation for NH<sub>3</sub>:

Emissions shall not exceed 42.5 lbs/hr.

Applicable Compliance Method:

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable facility-wide requirements in Part II(B)(4) of this permit.

**VI. Miscellaneous Requirements**

1. For the purpose of demonstrating compliance with the allowable emissions limits, the sum of the allowable limits for all units vented to the control system during the compliance demonstration shall be utilized for comparison against the measured emissions.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P048 System 4 resin reactor #2 w/wet scrubber	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P049 System 4 Granulation Drum and Process Cooler w/fabric filters (60,000 lbs/hr maximum)	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	OAC rule 3745-23-06(B)
	OAC Rule 3745-31-05(A)(3)	OAC rule 3745-21-08(B)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)

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Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

NH<sub>3</sub> emissions shall not exceed 20.0 lbs/hour.

Particulate emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year.

Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 3.03 pounds per hour and 13.3 tons per year.

NO<sub>x</sub> emissions shall not exceed 0.09 pounds per hour and 0.40 tons per year. See A.II.2. below.

CO emissions shall not exceed 0.02 pounds per hour and 0.09 tons per year. See A.II.2. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.
- 2. The permittee shall burn only natural gas or LPG in this emissions unit.
- 3. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
- 2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).

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

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM10, and permanent total enclosure:

Particulate emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year. PM10 emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201A or Method 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Methods 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the

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emissions unit operating parameters, the time(s) and date(s) of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**Emissions Limitation for NH<sub>3</sub>:**

Emissions shall not exceed 20.0 lbs/hr.

**Applicable Compliance Method:**

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable facility-wide requirements in Part II(B)(4) of this permit.

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Emissions Limitation:

NOx emissions shall not exceed 0.09 lb/hr and 0.40 tons per year.

Applicable Compliance Method:

Compliance for the NOx emission limits be based upon an emission factor of 100 lb Nox/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 850 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.0.02 lb/hr and 0.09 ton/yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 850 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress points A12 and A13 are equal to or less than the sum of the emission limits for P049, P051 and P052 (total of each emission limitation of each emission unit venting to that egress point).

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 System 4 Granulation Drum and Process Cooler w/fabric filters	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

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**The Scotts Co**

**DTI Application: 01 07002**

**Facility ID: 0180010008**

Emissions Unit ID: **P049**

None

**Issued: To be entered upon final issuance****Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 System 4 Packaging Operations w/fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)       OAC rule 3745-17-07(A)(1)    OAC rule 3745-17-11(B)	See A.I.2. below for Best Available Control Technology (BACT) determination.  Particulate emissions shall not exceed 0.51 pounds per hour and 2.25 tons per year.  Particulate emissions less than 10 microns (PM10) shall not exceed 0.38 pounds per hour and 1.67 tons per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.  Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.  The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10

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through 20.

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install fabric filters to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across each fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
- 2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device,

monitoring equipment, and the associated emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the three (3) fabric filters did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM10, and permanent total enclosure:

Particulate emissions shall not exceed 0.51 pounds per hour and 2.25 tons per year. Particulate emissions less than 10 microns (PM10) shall not exceed 0.38 pounds per hour and 1.67 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after the issuance of this permit, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201A or Method 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to

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the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A14 is equal to or less than the emission limits for P050.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 System 4 Packaging Operations w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P051 System 4 milling, screening, elevators and conveyors w/fabric filter	<p>40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20</p> <p>OAC Rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-17-07(A)(1)</p> <p>OAC rule 3745-17-11(B)</p>	<p>See A.I.2. below for Best Available Control Technology (BACT) determination.</p> <p>Particulate emissions shall not exceed 0.51 pound per hour and 2.2 tons per year.</p> <p>Particulate emissions less than 10 microns (PM10) shall not exceed 0.51 pound per hour and 2.2 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.</p> <p>Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.</p> <p>The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and 3745-31-10</p>

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through 20.

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
- 2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device,

monitoring equipment, and the associated emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM<sub>10</sub>, and permanent total enclosure:

Particulate emissions shall not exceed 0.51 pounds per hour and 2.2 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.51 pounds per hour and 2.2 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and PM<sub>10</sub>. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to

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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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A13 is equal to or less than the sum of the emission limits for P049, P051 and P052 minus the total emissions from egress point A12 (which are the emissions from the granulation drum, P049).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P051 System 4 milling, screening, elevators and conveyors w/fabric filter	None	None

2. **Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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Emissions Unit ID: **P051**

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11(B)
P052 System 4 blending w/fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	

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Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.22 pound per hour and 0.95 ton per year.

Organic compounds emissions shall not exceed 1.5 pounds per hour and 6.6 tons per year from the pesticide melter/mixer (P053), System 3 blender (P042) and System 4 blender (P052).

Particulate emissions less than 10 microns (PM10) shall not exceed 0.22 pound per hour and 0.95 ton per year.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
- 2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM<sub>10</sub>, and permanent total enclosure:

Particulate emissions shall not exceed 0.22 pounds per hour and 0.95 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.22 pounds per hour and 0.95 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and PM<sub>10</sub>. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who

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will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**Emissions Limitation:**

Organic compounds emissions shall not exceed 1.5 pounds per hour and 6.6 tons per year from the pesticide melter/mixer (P053), System 3 blender (P042) and System 4 blender (P052).

**Applicable Compliance Method:**

Compliance with this limit is based on previous stack test conducted in similar emissions units at the facility. The permittee conducted stack testing on System 1 and System 2 pesticide melters and blenders. The stack test results were 0.49 pound per hour of organic compounds. If required, the permittee shall conduct stack testing to show compliance with these emissions limitations in accordance to test methods 1-4 and 25A.

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A13 is equal to or less than the sum of the emission limits for P049, P051 and P052 minus the total emissions from egress point A12 (which are the emissions from the granulation drum, P049).

2. The permittee shall notify the Ohio EPA, Central District Office, 30 days prior to any modification to the blending operation which will cause potential or actual increases in air flow across the raw materials introduced into the blender (P052) above 1,000 CFM.
3. The permittee shall notify the Ohio EPA, Central District Office, 30 days prior to any modification to the blending operation which will cause potential or actual increases in the operating temperature of the blending operation (P052) above 85 degrees Fahrenheit.
4. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees 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 changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P052 System 4 blending w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Facility ID: 0180010008**

Emissions Unit ID: **P052**

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11(B)
P053 System 3&4 mixer melters w/wet scrubber	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	

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Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.51 pound per hour and 2.2 tons per year;

Organic compounds emissions shall not exceed 1.50 pounds per hour and 6.6 tons per year from the pesticide melter/mixer (P053), System 3 blender (P042) and System 4 blender (P052).

Particulate emissions less than 10 microns (PM10) shall not exceed 0.51 pound per hour and 2.2 tons per year;

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a wet scrubber to control of PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the wet scrubber shall not exceed 0.01 grain/scf.

**II. Operational Restrictions**

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 0.15 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained consistent with the scrubber manufacturer's recommended range.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, inspect, and maintain equipment to monitor the pressure drop across the wet scrubber and water flow rate through the wet scrubber while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the wet scrubber and the water flow rate through the wet scrubber on a per shift basis.
2. The per shift records shall include the shift, the time, the date the monitoring is performed, the Ohio EPA Source ID number, the company's control unit ID number, the person's name performing the monitoring, and actual measured pressure drop in inches of water column across the wet scrubber and the actual measured gallons of water per minute through the wet scrubber.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify each period of time during which the pressure drop across the wet scrubber did not comply with the allowable range specified above.
2. The permittee shall submit water flow rate deviation (excursion) reports that identify each period of time during which the water flow rate through the scrubber did not comply with the allowable range specified above.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be

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determined in accordance with the following methods:

Emissions Limitations for particulate and PM<sub>10</sub>:

Particulate emissions shall not exceed 0.51 pounds per hour and 2.2 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.51 pounds per hour and 2.2 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and PM<sub>10</sub>. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the

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tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

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Emissions Limitation:

Organic compounds emissions shall not exceed 1.5 pounds per hour and 6.6 tons per year from the pesticide melter/mixer (P053), System 3 blender (P042) and System 4 blender (P052).

Applicable Compliance Method:

Compliance with this limit is based on previous stack test conducted in similar emissions units at the facility. The permittee conducted stack testing on System 1 and System 2 pesticide melters and blenders. The stack test results were 0.49 pound per hour of organic compounds. If required, the permittee shall conduct stack testing to show compliance with these emissions limitations in accordance to test methods 1-4 and 25A.

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A8 is equal to or less than the emission limits for P053.
2. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees 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 changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P053 System 3&4 mixer melters w/wet scrubber	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P054 Specialty Mon-A-Mon , & Potash Handling/unl oading w/ fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)(1)	

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Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 1.4 pounds per hour and 6.1 tons per year;

Fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average;

Particulate emissions less than 10 microns (PM10) shall not exceed 1.06 pounds per hour and 4.6 tons per year (these emissions limits include fugitive emissions);

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT) that is sufficient to minimize or eliminate visible emissions of fugitive dust. The emissions from the fabric filter shall not exceed 0.005 grain PM/scf.

**II. Operational Restrictions**

1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 1.4 pounds per hour and 6.1 tons per year; Particulate emissions less than 10 microns (PM10) shall not exceed 1.06 pounds per hour and 4.6 tons per year (these emissions limits include fugitive emissions)

Applicable Compliance Method:

Fugitive PM/PM10 mass emissions determination- Fugitive emissions estimates for this operation shall be based upon an overall 94% capture efficiency and an uncontrolled PM/PM10 emissions factor of 0.2 lb/ton (based on the Ohio EPA RACM document, Figure

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2.12.-3) of material handled unless otherwise approved by Ohio EPA.

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable PM and PM10 emissions limits. The following test methods shall be employed to demonstrate compliance with the allowable mass emissions rates:

for particulate, Methods 1-4 and Method 5;  
for PM10, Method 201 or 201A of 40 CFR Part 51, Appendix A.

The emissions testing shall be conducted while the emissions units are operating at or near the maximum capacities, unless otherwise approved by the Ohio EPA.

Not later than 30 days prior to the proposed test dates, the permittee shall submit a completed "Intent To Test" (ITT) to the Ohio EPA Central District Office. The ITT 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 tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA refusal to accept the results of the emissions test.

Personnel from the Ohio EPA shall be permitted to witness the tests, 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 Ohio EPA Central District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule and fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A5 is equal to or less than 1.00 pound of PM10 per hour.

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P054 Specialty Mon-A-Mon , & Potash Handling/unl oading w/ fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P055 Specialty Urea Handling/Unloading w/fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)(1)	

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Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.25 pound per hour and 1.1 tons per year;

Fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average;

Particulate emissions less than 10 microns (PM10) shall not exceed 0.8 pound per hour and 0.21 ton per year (these emissions limits include fugitive emissions);

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation

specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT) that is sufficient to minimize or eliminate visible emissions of fugitive dust. The emissions from the fabric filter shall not exceed 0.005 grain PM/scf.

**II. Operational Restrictions**

1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.25 pound per hour and 1.1 tons per year; Particulate emissions less than 10 microns (PM10) shall not exceed 0.8 pound per hour and .21 ton per year (these emissions limits include fugitive emissions);

Applicable Compliance Method:

Fugitive PM/PM10 mass emissions determination- Fugitive emissions estimates for this operation shall be based upon an overall 94% capture efficiency and an uncontrolled emissions factors of 0.02 lb PM/ton and 0.017 lb PM10/ton (both based on FIRE v6.01/SCC 301040007) of material

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handled unless otherwise approved by Ohio EPA.

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable PM and PM10 emissions limits.

The emissions testing shall be conducted while the emissions units are operating at or near the maximum capacities, unless otherwise approved by the Ohio EPA.

Not later than 30 days prior to the proposed test dates, the permittee shall submit a completed "Intent To Test" (ITT) to the Ohio EPA Central District Office. The ITT 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 tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA refusal to accept the results of the emissions test.

Personnel from the Ohio EPA shall be permitted to witness the tests, 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 Ohio EPA Central District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule and fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1) and OAC rule 3745-17-03(B)(3).

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A4 is equal to or less than 0.17 pound of PM10 per hour.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P055 Specialty Urea Handling/Unloading w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P056 Specialty resin reactor #1 w/wet scrubber	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	See A.I.2. below for Best Available Control Technology (BACT) determination.
	OAC Rule 3745-31-05(A)(3)	NH3 emissions shall not exceed 42.0 lbs/hour.
		Particulate emissions shall not exceed 0.44 pounds per hour and 1.9 tons per year.
		Particulate emissions less than 10 microns (PM10) shall not exceed 0.44 pounds per hour and 1.9 tons per year.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.
	OAC rule 3745-17-11(B)	Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.
		The emissions limitation specified by this

rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

## **2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a wet scrubber to control of PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the wet scrubber shall not exceed 0.01 grain/scf.

## **II. Operational Restrictions**

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 0.15 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained consistent with the scrubber manufacturer's recommended range.

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, inspect, and maintain equipment to monitor the pressure drop across the wet scrubber and water flow rate through the wet scrubber while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the wet scrubber and the water flow rate through the wet scrubber on a per shift basis.
2. The per shift records shall include the shift, the time, the date the monitoring is performed, the Ohio EPA Source ID number, the company's control unit ID number, the person's name performing the monitoring, and actual measured pressure drop in inches of water column across the wet scrubber and the actual measured gallons of water per minute through the wet scrubber.

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify each period of time during which the pressure drop across the wet scrubber did not comply with the allowable range specified above. The reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit water flow rate deviation (excursion) reports that identify each period

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of time during which the water flow rate through the scrubber did not comply with the allowable range specified above. The reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

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Emissions Limitations for particulate and PM<sub>10</sub>:

Particulate emissions shall not exceed 0.44 pounds per hour and 1.9 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.44 pounds per hour and 1.9 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and, PM<sub>10</sub>. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA

**The Scotts Co**

**DTI Application: 01-07002**

**Facility ID: 0180010008**

Emissions Unit ID: **P056**

District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

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Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation for NH<sub>3</sub>:

Emissions shall not exceed 42.0 lbs/hr.

Applicable Compliance Method:

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable facility-wide requirements in Part II(B)(4) of this permit.

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A7 is equal to or less than the sum of the emission limits for P056 and P057 (total of each emission limitation of each emission unit venting to that egress point).

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P056 Specialty resin reactor #1 w/wet scrubber	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P057 Specialty resin reactor #2 w/wet scrubber	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	See A.I.2. below for Best Available Control Technology (BACT) determination.  NH3 emissions shall not exceed 42.0 lbs/hour.  Particulate emissions shall not exceed 0.44 pounds per hour and 1.9 tons per year.  Particulate emissions less than 10 microns (PM10) shall not exceed 0.44 pounds per hour and 1.9 tons per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.  Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.  The emissions limitation specified by this
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(B)	

rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

## 2. Additional Terms and Conditions

- 2.a Pursuant to 40 CFR 52.21, the permittee shall install a wet scrubber to control of PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the wet scrubber shall not exceed 0.01 grain/scf.

## II. Operational Restrictions

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 0.15 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained consistent with the scrubber manufacturer's recommended range.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, inspect, and maintain equipment to monitor the pressure drop across the wet scrubber and water flow rate through the wet scrubber while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the wet scrubber and the water flow rate through the wet scrubber on a per shift basis.
2. The per shift records shall include the shift, the time, the date the monitoring is performed, the Ohio EPA Source ID number, the company's control unit ID number, the person's name performing the monitoring, and actual measured pressure drop in inches of water column across the wet scrubber and the actual measured gallons of water per minute through the wet scrubber.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify each period of time during which the pressure drop across the wet scrubber did not comply with the allowable range specified above. The reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit water flow rate deviation (excursion) reports that identify each period

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of time during which the water flow rate through the scrubber did not comply with the allowable range specified above. The reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

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Emissions Limitations for particulate and PM<sub>10</sub>:

Particulate emissions shall not exceed 0.44 pounds per hour and 1.9 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.44 pounds per hour and 1.9 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and PM<sub>10</sub>.

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the

Emissions Unit ID: **P057**

tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**Emissions Limitation for NH<sub>3</sub>:**

Emissions shall not exceed 42.0 lbs/hr.

**Applicable Compliance Method:**

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable facility-wide requirements in Part II(B)(4) of this permit.

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A7 is equal to or less than the sum of the emission limits for P056 and P057 (total of each emission limitation of each emission unit venting to that egress point).

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Specialty resin reactor #2 w/wet scrubber	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P058 Specialty Granulation Drum and Process Cooler w/fabric filters (60,000 lbs/hr maximum)	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	OAC rule 3745-23-06(B)
	OAC Rule 3745-31-05(A)(3)	OAC rule 3745-21-08(B)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)

Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

NH3 emissions shall not exceed 20.0 lbs/hour.

Particulate emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year.

Particulate emissions less than 10 microns (PM10) shall not exceed 3.03 pounds per hour and 13.3 tons per year.

NOx emissions shall not exceed 0.09 pounds per hour and 0.40 tons per year. See A.II.2. below.

CO emissions shall not exceed 0.02 pounds per hour and 0.09 tons per year. See A.II.2. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule

3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

**2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.

**2.b** There shall be no fugitive emissions from this emissions unit.

**II. Operational Restrictions**

1. The pressure drop across the fabric filter shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.

2. The permittee shall burn only natural gas or LPG in this emissions unit.

3. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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#### **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### **V. Testing Requirements**

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

Emissions Limitations for particulate, PM10, and permanent total enclosure:

Particulate emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year. PM10 emissions shall not exceed 3.03 pounds per hour and 13.3 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Methods 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**Emissions Limitation for NH<sub>3</sub>:**

Emissions shall not exceed 42.0 lbs/hr.

**Applicable Compliance Method:**

Compliance with the NH<sub>3</sub> emissions limit for this unit shall be demonstrated via the emissions testing required in the state-only enforceable facility-wide requirements in Part II(B)(4) of this permit.

**Emissions Limitation:**

NO<sub>x</sub> emissions shall not exceed 0.09 lb/hr and 0.40 tons per year.

**Applicable Compliance Method:**

Compliance for the NO<sub>x</sub> emission limits be based upon an emission factor of 100 lb No<sub>x</sub>/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 850 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Unit ID: **P058**

## Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.0.02 lb/hr and 0.09 ton/yr.

## Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 850 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress points A2 and A3 are equal to or less than the sum of the emission limits for P058, P059 and P060 (total of each emission limitation for each emission unit venting to that egress point).

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P058 Specialty Granulation Drum and Process Cooler w/fabric filters (60,000 lbs/hr maximum)	None	See Part II. B.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P059 Specialty milling, screening, elevators and conveyors w/fabric filter	<p>40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20</p> <p>OAC Rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-17-07(A)(1)</p> <p>OAC rule 3745-17-11(B)</p>	<p>See A.I.2. below for Best Available Control Technology (BACT) determination.</p> <p>Particulate emissions shall not exceed 0.51 pound per hour and 2.2 tons per year.</p> <p>Particulate emissions less than 10 microns (PM10) shall not exceed 0.51 pound per hour and 2.2 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.</p> <p>Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.</p> <p>The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10</p>

**Issued: To be entered upon final issuance**  
through 20.

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit

**II. Operational Restrictions**

1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device,

monitoring equipment, and the associated emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM<sub>10</sub>, and permanent total enclosure:

Particulate emissions shall not exceed 0.51 pounds per hour and 2.2 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.51 pounds per hour and 2.2 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and PM<sub>10</sub>. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to

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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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A3 is equal to or less than the sum of the emission limits for P058, P059 and P060 minus the total emissions from egress point A2 (which are the emissions from the granulation drum, P058).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P059 Specialty milling, screening, elevators and conveyors w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P060 Specialty blending w/fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	See A.I.2. below for Best Available Control Technology (BACT) determination.
	OAC Rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 0.07 pound per hour and 0.32 ton per year.
	OAC rule 3745-17-07(A)(1)	Particulate emissions less than 10 microns (PM10) shall not exceed 0.07 pound per hour and 0.32 ton per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.
	OAC rule 3745-17-11(B)	Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.
		The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10

**Issued: To be entered upon final issuance**  
through 20.

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device,

monitoring equipment, and the associated emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

#### V. Testing Requirements

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

Emissions Limitations for particulate, PM<sub>10</sub>, and permanent total enclosure:

Particulate emissions shall not exceed 0.07 pounds per hour and 0.32 tons per year. Particulate emissions less than 10 microns (PM<sub>10</sub>) shall not exceed 0.07 pounds per hour and 0.32 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit the permittee shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable mass emission rate for particulate and PM<sub>10</sub>. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for particulate, Method 5 of 40 CFR Part 60, Appendix A;

for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix A;

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to

Emissions Unit ID: **P060**

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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A3 is equal to or less than the sum of the emission limits for P058, P059 and P060 minus the total emissions from egress point A2 (which are the emissions from the granulation drum, P058).

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P060 Specialty blending w/fabric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**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	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11(B)
P061 Specialty Packaging Operations w/fabric filter	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)(1)	

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Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.51 pounds per hour and 2.25 tons per year.

Particulate emissions less than 10 microns (PM10) shall not exceed 0.38 pounds per hour and 1.67 tons per year.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

## 2. Additional Terms and Conditions

- 2.a Pursuant to 40 CFR 52.21, the permittee shall install fabric filters to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

## II. Operational Restrictions

- 1. The pressure drop across each fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.
- 2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

## IV. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the three (3) fabric filters did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central

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District Office in accordance with section A.1. of the general terms and conditions of this permit.

2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

Emissions Limitations for particulate, PM10, and permanent total enclosure:

Particulate emissions shall not exceed 0.51 pounds per hour and 2.25 tons per year. Particulate emissions less than 10 microns (PM10) shall not exceed 0.38 pounds per hour and 1.67 tons per year. There shall be no fugitive emissions escaping from the building housing this emissions unit.

Applicable Compliance Method:

Within 90 days after the issuance of this permit, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The following test method shall be employed to demonstrate compliance with the permanent total enclosure: Method 204 for permanent total enclosure. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

## **VI. Miscellaneous Requirements**

1. This emissions unit shall be deemed in compliance if the total emissions from egress point A6 is equal to or less than the emission limits for P061.

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P061 Specialty Packaging Operation s w/fab ric filter	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

Emissions Unit ID: **P061**

**Issued: To be entered upon final issuance**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P062 Vermiculite Expander Number 1	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	OAC rule 3745-21-08(B)
	OAC Rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)
	OAC rule 3745-23-06(B)	

Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year.

Particulate emissions less than 10 microns (PM10) shall not exceed 0.28 pounds per hour and 1.24 tons per year.

NO<sub>x</sub> emissions not to exceed 0.15 pound per hour and 0.66 tons per year. See A.II.2. below.

CO emissions not to exceed 0.13 pound per hour and 0.57 ton per year. See A.II.2. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less

stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

**Issued: To be entered upon final issuance**

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.
- 2. The permittee shall burn only natural gas or LPG in this emissions unit.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

**IV. Reporting Requirements**

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**Issued: To be entered upon final issuance**

**V. Testing Requirements**

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

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year. PM10 emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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

Emissions Unit ID: P062

the appropriate Ohio EPA District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation:

NOx emissions shall not exceed 0.15 lb/hr and 0.66 tons per year.

Applicable Compliance Method:

Compliance for the NOx emission limits be based upon an emission factor of 100 lb Nox/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.13 lb/hr and 0.57 ton/yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

## VI. Miscellaneous Requirements

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P062 Vermiculite Expander Number 1	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P063 Vermiculite Expander Number 2	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20	OAC rule 3745-21-08(B)
	OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)
	OAC rule 3745-23-06(B)	

Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year.

Particulate emissions less than 10 microns (PM10) shall not exceed 0.28 pounds per hour and 1.24 tons per year.

NO<sub>x</sub> emissions not to exceed 0.15 pound per hour and 0.66 tons per year. See A.II.2. below.

CO emissions not to exceed 0.13 pound per hour and 0.57 ton per year. See A.II.2. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less

stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.
- 2. The permittee shall burn only natural gas or LPG in this emissions unit.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

**IV. Reporting Requirements**

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**Issued: To be entered upon final issuance**

**V. Testing Requirements**

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

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year. PM10 emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 Ohio EPA District Office or local air agency.

**The Scotts Co**

**PTI Application: 01-07992**

**Facility ID: 0180010008**

**Emissions Unit ID: P063**

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation:

NO<sub>x</sub> emissions shall not exceed 0.15 lb/hr and 0.66 tons per year.

Applicable Compliance Method:

Compliance for the NO<sub>x</sub> emission limits be based upon an emission factor of 100 lb No<sub>x</sub>/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.13 lb/hr and 0.57 ton/yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P063 Vermiculite Expander Number 2	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P064 Vermiculite Expander Number 3	40 <u>CFR</u> Part 52.21	
	OAC Rule 3745-31-10 through 20	
	OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)
	OAC rule 3745-23-06(B)	
	OAC rule 3745-21-08(B)	

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Applicable Emissions  
Limitations/Control  
Measures

See A.I.2.. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year.

Particulate emissions less than 10 microns (PM10) shall not exceed 0.28 pounds per hour and 1.24 tons per year.

NOx emissions not to exceed 0.15 pound per hour and 0.66 tons per year. See A.II.2. below.

CO emissions not to exceed 0.13 pound per hour and 0.57 ton per year. See A.II.2. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

The emissions limitation specified by this rule is less stringent than the emission limitation established

pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.
- 2. The permittee shall burn only natural gas or LPG in this emissions unit.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

**IV. Reporting Requirements**

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

## V. Testing Requirements

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

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year. PM10 emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 Ohio EPA District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Issued: To be entered upon final issuance**

Emissions Unit ID: **P064**

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation:

NO<sub>x</sub> emissions shall not exceed 0.15 lb/hr and 0.66 tons per year.

Applicable Compliance Method:

Compliance for the NO<sub>x</sub> emission limits be based upon an emission factor of 100 lb No<sub>x</sub>/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.13 lb/hr and 0.57 ton/yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P064 Vermiculite Expander Number 3	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P065 Vermiculite Expander Number 4	40 <u>CFR</u> Part 52.21 OAC Rule 3745-31-10 through 20  OAC Rule 3745-31-05(A)(3) and 40 CFR, 52.21  OAC rule 3745-17-07(A)(1)  OAC rule 3745-17-11(B)
	OAC rule 3745-23-06(B)
	OAC rule 3745-21-08(B)

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control  
Measures

See A.I.2. below for Best Available Control Technology (BACT) determination.

Particulate emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year.

Particulate emissions less than 10 microns (PM10) shall not exceed 0.28 pounds per hour and 1.24 tons per year.

NOx emissions not to exceed 0.15 pound per hour and 0.66 tons per year. See A.II.2. below.

CO emissions not to exceed 0.13 pound per hour and 0.57 ton per year. See A.II.2. below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.

The emissions limitation specified by this rule is less stringent than the emission limitation established

pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

**Issued: To be entered upon final issuance**

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT). The emissions from the fabric filter shall not exceed 0.005 grain/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.
- 2. The permittee shall burn only natural gas or LPG in this emissions unit.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across each fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit.

**IV. Reporting Requirements**

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

## V. Testing Requirements

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

Emissions Limitations for particulate and PM10:

Particulate emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year. PM10 emissions shall not exceed 0.28 pounds per hour and 1.24 tons per year.

Applicable Compliance Method:

Within 90 days after startup of this emissions unit, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 Ohio EPA District Office or local air agency.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.

**Issued: To be entered upon final issuance**

Emissions Unit ID: **P065**

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

Emissions Limitation:

NOx emissions shall not exceed 0.15 lb/hr and 0.66 tons per year.

Applicable Compliance Method:

Compliance for the NOx emission limits be based upon an emission factor of 100 lb Nox/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.13 lb/hr and 0.57 ton/yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P065 Vermiculite Expander Number 4	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### 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

- 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>	<u>Applicable Emissions Limitations/Control Measures</u>
P066 Vermiculite Expander Receiving System	40 <u>CFR</u> Part 52.21	See A.I.2. below for Best Available Control Technology (BACT) determination
	OAC Rule 3745-31-10 through 20	
	OAC Rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 0.45 pound per hour and 1.96 ton per year;  Fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average;
	OAC rule 3745-17-07(A)(1)	Particulate emissions less than 10 microns (PM10) shall not exceed 0.45 pound per hour and 1.96 ton per year (these emissions limits include fugitive emissions);  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-10 through 20.
	OAC rule 3745-17-11(B)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6 minute average, except as exempted by rule.  The emissions limitation specified by this rule is less stringent than the emission

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limitation established  
pursuant to OAC rules  
3745-31-05(A)(3) and  
3745-31-10 through 20.

**2. Additional Terms and Conditions**

- 2.a** Pursuant to 40 CFR 52.21, the permittee shall install a fabric filter to control PM/PM10 emissions as Best Available Control Technology (BACT) that is sufficient to minimize or eliminate visible emissions of fugitive dust. The emissions from the fabric filter shall not exceed 0.005 grain PM/scf.
- 2.b** There shall be no fugitive emissions escaping from the building housing this emissions unit. To ensure compliance with this limit, the permittee shall maintain a permanent total enclosure for this emissions unit.

**II. Operational Restrictions**

- 1. The pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. This facility shall install, operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each fabric filter at least once per each operating shift of the emissions unit..

**IV. Reporting Requirements**

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with section A.1. of the general terms and conditions of this permit.

**V. Testing Requirements**

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

Emissions Unit ID: **P066****Emissions Limitation:**

Particulate emissions shall not exceed 0.45 pounds per hour and 1.96 tons per year; Particulate emissions less than 10 microns (PM10) shall not exceed 0.45 pounds per hour and 1.96 tons per year (these emissions limits include fugitive emissions)

**Applicable Compliance Method:**

No later than 90 days after startup of this unit, this facility shall conduct, or have conducted, emissions testing to demonstrate compliance with the allowable PM and PM10 emissions limits.

The following test methods shall be employed to demonstrate compliance with the allowable mass emissions rates: Methods 1-4 and; Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The emissions testing shall be conducted while the emissions units are operating at or near the maximum capacities, unless otherwise approved by the Ohio EPA.

Not later than 30 days prior to the proposed test dates, the permittee shall submit a completed "Intent To Test" (ITT) to the Ohio EPA Central District Office. The ITT 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 tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA refusal to accept the results of the emissions test.

Personnel from the Ohio EPA shall be permitted to witness the tests, 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 Ohio EPA Central District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

**Emissions Limitation:**

Visible particulate emissions shall not exceed 20% opacity as a 6 minute average, except as exempted by rule and fugitive visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 3 minute average.

**Applicable Compliance Method:**

Compliance with the visible particulate emissions opacity limit shall be determined by the methods specified in OAC rule 3745-17-03(B)(1).

**Emissions Limitation:**

NOx emissions shall not exceed 0.15 lb/hr and 0.66 tons per year.

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance for the NO<sub>x</sub> emission limits be based upon an emission factor of 100 lb Nox/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Emissions Limitation:

Carbon Monoxide emissions shall not exceed 0.13 lb/hr and 0.57 ton/yr.

Applicable Compliance Method:

Compliance with the CO emission limits shall be based upon an emission factor 84 lbs CO/million cubic feet (from table 1.4-1(7/98) of AP-42, 5<sup>th</sup> edition) and a maximum natural gas consumption of 1554 CFH. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P066 Vermiculite Expander Receiving System	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None