

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install #01-8386

A. Source Description

The Scotts Company (Scotts) has submitted an application for a federally enforceable synthetic minor permit for a new pesticide blending operation with seven process emissions units and one tank. The new blending process is being installed to replace the US EPA banned pesticide, diazanon, with a new pesticide, bifenthrin. Scotts currently has a PSD permit for particulate and is attempting to avoid triggering PSD for organic compounds (OC). The emissions units combined have a potential to emit of over 40 tons of OC. The terms and conditions of this permit include federally enforceable OC emissions limitations and operation restrictions which will restrict the potential to emit below the levels that trigger PSD.

B. Facility Emissions and Attainment Status

The facility has proposed emissions restrictions for OC in order to limit the facility's potential to emit for OC below 40 tons per year. In addition, each of the emissions units (except for T012) is restricted in its hours of operation and required to operate control equipment to ensure the limitation is achieved. Scotts is located in Union County which is considered attainment for OC.

	<u>PTE Pre-Synthetic Minor PTI</u>	<u>PTE Post Synthetic Minor PTI</u>
OC	3526 tpy	34.2 tpy
Particulate	43.8 tpy	0.6 tpy

C. Source Emissions

The restricted operational limits and requirements for control equipment limit Scotts potential emissions to 34.2 tons of OC per rolling, 12-month period. The terms and conditions of the permit require Scotts to install control equipment with efficiencies of at least 98%. The term emissions limitations were established to reflect the emission unit's potential to emit when vented to a carbon adsorber or thermal incinerator and in compliance with operational limitations.

D. Conclusion

Scotts has requested federally enforceable limitations for their new pesticide blending line in order to avoid triggering PSD for OC. Through use of control equipment and restricted hours of operation, the combined emissions of these units will be 34.2 tons of OC per year. The terms and conditions of this permit require Scotts to closely monitor the effectiveness of the control equipment and hours of operation to ensure attainment with the limitations.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
UNION COUNTY**

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 01-08386

DATE: 8/7/2001

The Scotts Co
Mike Black
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 for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 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 a fee of \$6600 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
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-08386

Application Number: 01-08386
APS Premise Number: 0180010008
Permit Fee: **To be entered upon final issuance**
Name of Facility: The Scotts Co
Person to Contact: Mike Black
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):

Pesticide mixing.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08386

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.

The Scotts Co

PTI Application: 01-08386

Issued: To be entered upon final issuance

Facility ID: 0180010008

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08386

Issued: To be entered upon final issuance

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08386

Issued: To be entered upon final issuance

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- 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

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08386

Issued: To be entered upon final issuance

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.

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08386

Issued: To be entered upon final issuance

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

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

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08386

Issued: To be entered upon final issuance

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).

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08386

Issued: To be entered upon final issuance

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)

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	34.2 tpy
Particulate	0.6 tpy

13

The Scotts Co

PTI Application: 01-08386

Issued: To be entered upon final issuance

Facility ID: 0180010008

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Emissions Unit ID: P008

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P008 - System 2 blender with carbon adsorber or thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.0 pounds per hour and 4.0 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
		See A.2.b below.
	OAC rule 3745-31-05(D)	See A.2.b-c and B.1. below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The above OC emission limitation of 2.0 pounds per hour was established to reflect the potential to emit for this emissions unit when vented to a thermal incinerator or carbon adsorber. Therefore, the parametric monitoring of the organic compound control

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equipment as established in the following terms and conditions will ensure compliance with these limits.

- 2.b** The permittee shall control organic compound emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.
- 2.c** Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

B. Operational Restrictions

- 1. The maximum annual operating hours for emissions units P008, P052, P069 and P070 combined shall not exceed 16,000 hours while blending pesticides, based on a rolling 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	1,600
1-2	3,200
1-3	4,800
1-4	6,400
1-5	8,000
1-6	9,600
1-7	11,200
1-8	12,800
1-9	14,400
1-10	15,000
1-11	15,500
1-12	16,000

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

- 2. The permittee shall properly install, operate, and maintain a thermal incinerator or carbon adsorber to capture organic compound emissions from this emissions unit. The organic

Emissions Unit ID: P008

compound control equipment must be in operation at all times the emissions unit is in operation.

3. If a thermal incinerator is installed to control OC emissions, the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
4. If a carbon adsorber is installed to control OC emissions, the average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total operating hours of P008;
 - b. the total operating hours of emissions units P008, P052, P069 and P070 combined;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours of emissions units P008, P052, P069 and P070 combined;
 - d. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours of emissions units P008, P052, P069 and P070 combined for each calendar month;
 - e. the total OC emissions for emission unit P008 using the following equation:
(hourly OC emission rate established by testing required in Section E.1.) x (the number of hours the emission unit is in operation required by Section C.1.a. above);
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above;
 - g. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above.
2. If a thermal incinerator is installed to control OC emissions, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of

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accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. If a carbon adsorber is installed to control OC emissions, the permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels for emissions units P008, P052, P069 and P070 combined . These reports

Emissions Unit ID: P008

shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P008, P052, P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
3. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the thermal incinerator or carbon adsorber was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
4. If a thermal incinerator is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
5. If a carbon adsorber is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration of the exhaust gases from the carbon adsorber exceeded the concentration limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**
OC emissions shall not exceed 2.0 pounds per hour and 4.0 tons per year.

Applicable Compliance Method:

To determine compliance with the hourly OC limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the federally enforceable control efficiency requirement.
- iii. The following test method(s) shall be employed to demonstrate compliance with

Emissions Unit ID: P008

the allowable mass emission rate(s): Methods 18, 25 and/or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

To determine compliance with the annual OC limitation, the permittee shall multiply the hourly OC emission rate determined through the testing required above by the annual hours of operation recorded in Section C.1. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual OC emissions in tons.

- b. Emissions Limitation:
The permittee shall control organic compound emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.

Applicable Compliance Method:

Compliance with the control efficiency shall be determined through emissions testing required in Section E.1.a. of this permit.

- c. Emissions Limitation:
Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section C.1. of this permit.

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

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

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

21

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District Office.

Emissions Unit ID: P008

F. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P008 - System 2 blender with carbon adsorber or thermal incinerator		

2. Additional Terms and Conditions

2.a 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. 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>
P020 - Bulk blend pesticide mix tanks with carbon adsorber or thermal incinerator (modification to PTI 01-03601, issued February 20, 1992)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.0 pounds per hour and 6.0 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See A.2.b. below See A.2.b-c and B.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The above OC emission limitation of 2.0 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a thermal incinerator or carbon adsorber. Therefore, the parametric monitoring of the organic compound control equipment as established in the following terms and conditions will ensure compliance with these limits.

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- 2.b** The permittee shall control OC emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.
- 2.c** Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070, and P020 combined.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 6,000 hours while blending pesticides, based on a rolling 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	1,000
1-2	2,000
1-3	2,500
1-4	3,000
1-5	3,500
1-6	4,000
1-7	4,500
1-8	5,000
1-9	5,500
1-10	5,700
1-11	5,900
1-12	6,000

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

2. The permittee shall properly install, operate, and maintain a thermal incinerator or carbon adsorber to capture organic compound emissions from this emissions unit. The organic compound control equipment must be in operation at all times the emissions unit is in operation.
3. If a thermal incinerator is installed to control OC emissions, the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in

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operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

4. If a carbon adsorber is installed to control OC emissions, the average OC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a OC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total operating hours of emissions unit P020;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours of P020;
 - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours of P020;
 - d. the total OC emissions for emission unit P020 using the following equation:
(hourly OC emission rate established by testing required in Section E.1.) x (the number of hours the emission unit is in operation required by Section C.1.a. above);
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above; and
 - f. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above.
2. If a thermal incinerator is installed to control OC emissions, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for the thermal incinerator at least once per each operating shift of the emissions unit:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. If a carbon adsorber is installed to control OC emissions, the permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for the carbon adsorber at least once per each operating shift of the emissions unit:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating levels for P120. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P008, P052, P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the thermal incinerator or carbon adsorber was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
4. If a thermal incinerator is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
5. If a carbon adsorber is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration of the exhaust gases from the carbon adsorber exceeded the concentration limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation:**
OC emissions shall not exceed 2.0 pounds per hour and 6.0 tons per year.

Applicable Compliance Method:

To determine compliance with the hourly OC limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the federally enforceable control efficiency requirement for organic compounds.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 18, 25 and/or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Central District Office.

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To determine compliance with the annual OC limitation, the permittee shall multiply the hourly emission rate for each pollutant determined through the testing required above by the annual hours of operation recorded in Section C.1. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain annual emissions in tons.

b. Emissions Limitation:

The permittee shall control organic compound emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.

Applicable Compliance Method:

Compliance with the control efficiency shall be determined through emissions testing required in Section E.1.a. of this permit.

c. Emissions Limitation:

Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section C.1. of this permit.

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

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

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

F. Miscellaneous Requirements

The Scotts Co
PTI Application: 01-00306
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Facility ID: 0180010008

Emissions Unit ID: P020

1. The terms and conditions of this permit are a modification to PTI 01-03601, issued February 20, 1992 and supercede those identified in all previously issued permits 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>
P020 - Bulk blend mix tanks with carbon adsorber or thermal incinerator (modification to PTI 01-03601, issued February 20, 1992)		

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

31

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Emissions Unit ID: P020

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P052 - System 4 blender with carbon adsorber or thermal incinerator (modification to PTI 01-07992, issued June 1, 2000)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.0 pounds per hour and 4.0 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See A.2.b below.
	OAC rule 3745-21-07(G)(2)	See A.2.b-c and B.1. below.
	OAC rule 3745-21-07(G)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

Emissions Unit ID: P052

- 2.a** The above OC emission limitation of 2.0 pounds per hour was established to reflect the potential to emit for this emissions unit when vented to a thermal incinerator or carbon adsorber. Therefore, the parametric monitoring of the organic compound control equipment as established in the following terms and conditions will ensure compliance with these limits.
- 2.b** The permittee shall control OC emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.
- 2.c** Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

B. Operational Restrictions

1. The maximum annual operating hours for emissions units P008, P052, P069 and P070 combined shall not exceed 16,000 hours while blending pesticides, based on a rolling, 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	1,600
1-2	3,200
1-3	4,800
1-4	6,400
1-5	8,000
1-6	9,600
1-7	11,200
1-8	12,800
1-9	14,400
1-10	15,000
1-11	15,500
1-12	16,000

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

2. The permittee shall properly install, operate, and maintain a thermal incinerator or carbon adsorber to capture organic compound emissions from this emissions unit. The organic compound control equipment must be in operation at all times the emissions unit is in operation.
3. If a thermal incinerator is installed to control OC emissions, the average combustion temperature

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within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

4. If a carbon adsorber is installed to control OC emissions, the average OC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a OC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total operating hours of emission unit P052;
 - b. the total operating hours of emissions units P008, P052, P069 and P070 combined;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours of emissions units P008, P052, P069 and P070 combined;
 - d. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours of emissions units P008, P052, P069 and P070 combined for each calendar month;
 - e. the total OC emissions for emission unit P052 using the following equation:
(hourly OC emission rate established by testing required in Section E.1.) x (the number of hours the emission unit is in operation required by Section C.1.a. above);
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P008, P052, P067 through P070 and P120 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above; and
 - g. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P008, P052, P067 through P070 and P120 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above.
2. If a thermal incinerator is installed to control OC emissions, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the

Emissions Unit ID: P052

combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. If a carbon adsorber is installed to control OC emissions, the permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels for emissions units P008, P052, P069 and P070 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

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2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P008, P052, P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
3. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the thermal incinerator or carbon adsorber was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
4. If a thermal incinerator is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
5. If a carbon adsorber is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration of the exhaust gases from the carbon adsorber exceeded the concentration limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**
OC emissions shall not exceed 2.0 pounds per hour and 4.0 tons per year.

Applicable Compliance Method:
To determine compliance with the hourly OC limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - i. The emission testing shall be conducted within 180 days of the startup of this emissions unit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the federally enforceable control efficiency requirement.

The Scotts Co
PTI Application: 01-00206
Issued

Facility ID: 0180010008

Emissions Unit ID: P052

- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 18, 25 and/or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Central District Office.

To determine compliance with the annual OC limitation, the permittee shall multiply the hourly OC emission rate determined through the testing required above by the annual hours of operation recorded in Section C.1. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain annual the OC emissions in tons.

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b. Emissions Limitation:

The permittee shall control organic compound emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.

Applicable Compliance Method:

Compliance with the control efficiency shall be determined through emissions testing required in Section E.1.a. of this permit.

c. Emissions Limitation:

Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section C.1. of this permit.

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

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

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

F. Miscellaneous Requirements

1. The terms and conditions of this permit are a modification to PTI 01-07992, issued June 1, 2000 and supercede those identified in all previously issued permits for this emissions unit.

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>
P052 - System 4 blender with carbon adsorber or thermal incinerator (modification to PTI 01-07992, issued June 1, 2000)		

2. Additional Terms and Conditions

2.a 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. 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>	
P067 - Bulk blend blending vessel with fabric filter and carbon adsorber or thermal incinerator	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-21-07(G)(6)	
	OAC rule 3745-17-07(A)(1)	

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Emissions Unit ID: P067

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Applicable Emissions
Limitations/Control Measures

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

Organic compound (OC) emissions shall not exceed 2.0 pounds per hour and 6.0 tons per year.

Particulate emissions shall not exceed 0.1 pound per hour and 0.6 ton per year.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

See A.2.b below.

See A.2.c-d and B.1 below.

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

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

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

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

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The above OC emission limitation of 2.0 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a thermal incinerator or carbon adsorber. Therefore, the parametric monitoring of the organic compound control equipment as established in the following terms and conditions will ensure compliance with these limits.
- 2.b** The above particulate emission limitations of 0.1 pound per hour and 0.6 ton per year were established to reflect the potential to emit for this emissions unit as vented to a fabric filter. Therefore, the parametric monitoring of the fabric filter as established in the following terms and conditions will ensure compliance with these limits.
- 2.c** The permittee shall control OC emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.
- 2.d** Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070, and P020 combined.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 6,000 hours while blending pesticides, based on a rolling, 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	1,000
1-2	2,000
1-3	2,500
1-4	3,000
1-5	3,500
1-6	4,000
1-7	4,500
1-8	5,000
1-9	5,500
1-10	5,700
1-11	5,900

1-12

6,000

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

2. The permittee shall properly install, operate, and maintain a fabric filter to capture particulate emissions from this emissions unit. The particulate control equipment must be used in conjunction with organic compound control equipment and be in operation at all times the emissions unit is in operation.
3. 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 it in operation.
4. The permittee shall properly install, operate, and maintain a thermal incinerator or carbon adsorber to capture organic compound emissions from this emissions unit. The organic compound control equipment must be in operation at all times the emissions unit is in operation.
5. If a thermal incinerator is installed to control OC emissions, the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
6. If a carbon adsorber is installed to control OC emissions, the average OC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a OC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total operating hours of emissions unit P067;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours of P067;
 - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours of P067;
 - d. the total OC emissions for emission unit P067 using the following equation:
 (hourly OC emission rate established by testing required in Section E.1.) x (the number of hours the emission unit is in operation required by Section C.1.a. above);
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P008, P052,

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P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above; and

- f. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above.
2. The 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 the fabric filter at least once per each operating shift of the emissions unit.
 3. If a thermal incinerator is installed to control OC emissions, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for the thermal incinerator at least once per each operating shift of the emissions unit:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. If a carbon adsorber is installed to control OC emissions, the permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and

Emissions Unit ID: P067

recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for the carbon adsorber at least once per each operating shift of the emissions unit:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating levels for P067. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P008, P052, P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
3. 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 in accordance with Section A.1. of the General Terms and Conditions of this permit.
4. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the fabric filter and/ or the thermal incinerator or carbon adsorber were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
5. If a thermal incinerator is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
6. If a carbon adsorber is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration of the exhaust gases from the carbon

Emissions Unit ID: P067

adsorber exceeded the concentration limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation:**
 OC emissions shall not exceed 2.0 pounds per hour and 6.0 tons per year.
 Particulate emissions shall not exceed 0.1 pound per hour and 0.6 ton per year.

Applicable Compliance Method:

To determine compliance with the hourly limitations, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the federally enforceable control efficiency requirement for organic compounds.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 18, 25 and/or 25A for organic compounds and Methods 1-5 for particulate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Central District Office.

To determine compliance with the annual OC limitation, the permittee shall multiply the hourly emission rate for each pollutant determined through the testing required above by the annual hours of operation recorded in Section C.1. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain annual emissions in tons.

- b. **Emissions Limitation:**
 The permittee shall control organic compound emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.

Applicable Compliance Method:

Compliance with the control efficiency shall be determined through emissions testing required in Section E.1.a. of this permit.

47

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Issued: To be entered upon final issuance

Emissions Unit ID: P067

Issued: To be entered upon final issuance

- c. Emissions Limitation:
Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section C.1. of this permit.

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

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

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

F. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P067 - Bulk blend blending vessel with carbon adsorber or thermal incinerator		

2. Additional Terms and Conditions

2.a 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. 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>
P068 - Bulk blending drum handling, storage and transfer operations with vented hood and carbon adsorber or thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.0 pounds per hour and 6.0 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See A.2.b. below.
	OAC rule 3745-21-07(G)(2)	See A.2.b-c and B.1. below.
	OAC rule 3745-21-07(G)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

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- 2.a** The above OC emission limitation of 2.0 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a thermal incinerator or carbon adsorber. Therefore, the parametric monitoring of the organic compound control equipment as established in the following terms and conditions will ensure compliance with these limits.
- 2.b** The permittee shall control OC emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.
- 2.c** Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 6,000 hours while blending pesticides, based on a rolling, 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	1,000
1-2	2,000
1-3	2,500
1-4	3,000
1-5	3,500
1-6	4,000
1-7	4,500
1-8	5,000
1-9	5,500
1-10	5,700
1-11	5,900
1-12	6,000

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

2. The permittee shall properly install, operate, and maintain a thermal incinerator or carbon

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adsorber to capture organic compound emissions from this emissions unit. The organic compound control equipment must be in operation at all times the emissions unit is in operation.

3. If a thermal incinerator is installed to control OC emissions, the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
4. If a carbon adsorber is installed to control OC emissions, the average OC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a OC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total operating hours of emissions unit P068;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours of P068;
 - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours of P068;
 - d. the total OC emissions for emission unit P068 using the following equation:
(hourly OC emission rate established by testing required in Section E.1.) x (the number of hours the emission unit is in operation required by Section C.1.a. above);
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above; and
 - f. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above.
2. If a thermal incinerator is installed to control OC emissions, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the

Emissions Unit ID: P068

combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. If a carbon adsorber is installed to control OC emissions, the permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating levels for P068. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

Emissions Unit ID: P068

rolling, 12-month cumulative OC emission limitation for emissions units P008, P052, P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

3. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the thermal incinerator or carbon adsorber was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
4. If a thermal incinerator is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
5. If a carbon adsorber is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration of the exhaust gases from the carbon adsorber exceeded the concentration limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**
 OC emissions shall not exceed 2.0 pounds per hour and 6.0 tons per year.

Applicable Compliance Method:
 To determine compliance with the hourly OC limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - i. The emission testing shall be conducted within 180 days of the startup of this emissions unit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the federally enforceable control efficiency requirement.
 - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 18, 25 and/or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - iv. The test(s) shall be conducted while the emissions unit is operating at or near its

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maximum capacity, unless otherwise specified or approved by Ohio EPA Central District Office.

To determine compliance with the annual OC limitation, the permittee shall multiply the hourly OC emission rate determined through the testing required above by the annual hours of operation recorded in Section C.1. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain annual the OC emissions in tons.

b. Emissions Limitation:

The permittee shall control organic compound emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.

Applicable Compliance Method:

Compliance with the control efficiency shall be determined through emissions testing required in Section E.1.a. of this permit.

c. Emissions Limitation:

Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section C.1. of this permit.

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

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

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

F. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P068 - Bulk blending drum handling, storage and transfer with vented hood and carbon adsorber or thermal incinerator		

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

58

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Issued: To be entered upon final issuance

None

Emissions Unit ID: P068

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P069 - System 1 pesticide blender with carbon adsorber or thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.0 pounds per hour and 4.0 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
		See A.2.b. below.
	OAC rule 3745-31-05(D)	See A.2.b-c and B.1. below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

Emissions Unit ID: P069

- 2.a** The above OC emission limitation of 2.0 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a thermal incinerator or carbon adsorber. Therefore, the parametric monitoring of the organic compound control equipment as established in the following terms and conditions will ensure compliance with these limits.
- 2.b** The permittee shall control OC emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.
- 2.c** Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

B. Operational Restrictions

1. The maximum annual operating hours for emissions units P008, P052, P069 and P070 combined shall not exceed 16,000 hours while blending pesticides, based on a rolling, 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	1,600
1-2	3,200
1-3	4,800
1-4	6,400
1-5	8,000
1-6	9,600
1-7	11,200
1-8	12,800
1-9	14,400
1-10	15,000
1-11	15,500
1-12	16,000

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

2. The permittee shall properly install, operate, and maintain a thermal incinerator or carbon adsorber to capture organic compound emissions from this emissions unit. The organic compound control equipment must be in operation at all times the emissions unit is in operation.
3. If a thermal incinerator is installed to control OC emissions, the average combustion temperature

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within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

4. If a carbon adsorber is installed to control OC emissions, the average OC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a OC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total operating hours of emissions unit P069;
 - b. the total operating hours of emissions units P008, P052, P069 and P070 combined;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours of emissions units P008, P052, P069 and P070 combined;
 - d. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours of emissions units P008, P052, P069 and P070 combined for each calendar month;
 - e. the total OC emissions for emission unit P069 using the following equation:
(hourly OC emission rate established by testing required in Section E.1.) x (the number of hours the emission unit is in operation required by Section C.1.a. above);
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above; and
 - g. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above.
2. If a thermal incinerator is installed to control OC emissions, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the

Emissions Unit ID: P069

combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. If a carbon adsorber is installed to control OC emissions, the permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels for emissions units P008, P052, P069 and P070 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

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2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P008, P052, P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
3. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the thermal incinerator or carbon adsorber was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
4. If a thermal incinerator is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
5. If a carbon adsorber is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration of the exhaust gases from the carbon adsorber exceeded the concentration limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
2. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**
OC emissions shall not exceed 2.0 pounds per hour and 4.0 tons per year.

Applicable Compliance Method:

To determine compliance with the hourly OC limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the startup of this emissions unit.

Emissions Unit ID: P069

- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the federally enforceable control efficiency requirement.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 18, 25 and/or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Central District Office.

To determine compliance with the annual OC limitation, the permittee shall multiply the hourly OC emission rate determined through the testing required above by the annual hours of operation recorded in Section C.1. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain annual the OC emissions in tons.

- b. Emissions Limitation:
The permittee shall control organic compound emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.

Applicable Compliance Method:

Compliance with the control efficiency shall be determined through emissions testing required in Section E.1.a. of this permit.

- c. Emissions Limitation:
Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section C.1. of this permit.

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

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

The Scotts Co**PTI Application: 01 00206****Issued****Facility ID: 0180010008**

Emissions Unit ID: P069

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 Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA Central District Office.

F. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P069 - System 1 blender with carbon adsorber or thermal incinerator		

2. Additional Terms and Conditions

2.a 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. 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>
P070 - System 3 pesticide blender with carbon adsorber or thermal incinerator	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.0 pounds per hour and 4.0 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See A.2.b below. See A.2.b-c and B.1. below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

Issued: To be entered upon final issuance

- 2.a** The above OC emission limitation of 2.0 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a thermal incinerator or carbon adsorber. Therefore, the parametric monitoring of the organic compound control equipment as established in the following terms and conditions will ensure compliance with these limits.
- 2.b** The permittee shall control OC emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.
- 2.c** Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

B. Operational Restrictions

1. The maximum annual operating hours for emissions units P008, P052, P069 and P070 combined shall not exceed 16,000 hours while blending pesticides, based on a rolling, 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	1,600
1-2	3,200
1-3	4,800
1-4	6,400
1-5	8,000
1-6	9,600
1-7	11,200
1-8	12,800
1-9	14,400
1-10	15,000
1-11	15,500
1-12	16,000

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

Emissions Unit ID: P070

2. The permittee shall properly install, operate, and maintain a thermal incinerator or carbon adsorber to capture organic compound emissions from this emissions unit. The organic compound control equipment must be in operation at all times the emissions unit is in operation.
3. If a thermal incinerator is installed to control OC emissions, the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
4. If a carbon adsorber is installed to control OC emissions, the average OC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a OC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total operating hours of emissions unit P070;
 - b. the total operating hours of emissions units P008, P052, P069 and P070 combined;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours of emissions units P008, P052, P069 and P070 combined;
 - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours of emissions units P008, P052, P069 and P070 combined for each calendar month;
 - d. the total OC emissions for emission unit P070 using the following equation:
(hourly OC emission rate established by testing required in Section E.1.) x (the number of hours the emission unit is in operation required by Section C.1.a. above);
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above; and
 - f. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for emissions units P008, P052, P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section C.1.e. above.
2. If a thermal incinerator is installed to control OC emissions, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the

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combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. If a carbon adsorber is installed to control OC emissions, the permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation

Emissions Unit ID: P070

following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels for emissions units P008, P052, P069 and P070 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P008, P052, P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
3. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the thermal incinerator or carbon adsorber was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
4. If a thermal incinerator is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.
5. If a carbon adsorber is installed to control OC emissions, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration of the exhaust gases from the carbon adsorber exceeded the concentration limitation specified above. These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**
OC emissions shall not exceed 2.0 pounds per hour and 4.0 tons per year.

Applicable Compliance Method:
To determine compliance with the hourly OC limitation, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - i. The emission testing shall be conducted within 180 days of the startup of this emissions unit.
 - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the federally enforceable control efficiency requirement.

The Scotts Co
PTI Application: 01 00206
Issued

Facility ID: 0180010008

Emissions Unit ID: P070

- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 18, 25 and/or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Central District Office.

To determine compliance with the annual OC limitation, the permittee shall multiply the hourly OC emission rate determined through the testing required above by the annual hours of operation recorded in Section C.1. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain annual the OC emissions in tons.

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b. Emissions Limitation:

The permittee shall control organic compound emissions from this emissions unit through the use of a thermal incinerator or carbon adsorber with a minimum control efficiency of 98%.

Applicable Compliance Method:

Compliance with the control efficiency shall be determined through emissions testing required in Section E.1.a. of this permit.

c. Emissions Limitation:

Organic compound emissions shall not exceed 34.2 tons per rolling, 12-month summation from emissions units P008, P052, P067 through P070 and P020 combined.

Applicable Compliance Method:

Compliance with the combined OC emissions limitation shall be demonstrated through the records required pursuant to Section C.1. of this permit.

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

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

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

F. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P070 - System 3 pesticide blender with carbon adsorber or thermal incinerator		

2. Additional Terms and Conditions

2.a 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. 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>
T012 - 16,400-gallon bifenthrin pesticide storage tank	OAC rule 3745-31-05(A)(3) 40 CFR 60, Subpart Kb	Organic compound (OC) emissions shall not exceed 0.19 ton per year. See A.2.a. below. See A.2.b. below.

2. Additional Terms and Conditions

- 2.a** This emissions unit shall employ submerged fill.
- 2.b** In accordance with 40 CFR 60.116b (a) and (b), the owner of the tank shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing its capacity for the life of the storage vessel.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

E. Testing Requirements

1. Compliance with the annual organic compound emissions limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:

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Emission Limitation:

Organic compound emissions shall not exceed 0.19 tons per year.

Applicable Compliance Method:

Total organic compound emissions from the storage tank shall be determined using the most recent version of US EPA's "Tanks" program.

F. Miscellaneous Requirements

1. The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation(Subpart)</u>
T012	16,500-gallon bifenthrin above-ground storage tank	40 CFR 60, Subparts A and Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Ohio Environmental Protection Agency
DAPC - Central District Office
3232 Alum Creek Drive
Columbus, OH 43207

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
T012 - Bifenthrin pesticide storage tank		

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

79

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Issued: To be entered upon final issuance

Emissions Unit ID: T012

NEW SOURCE REVIEW FORM B

PTI Number: 01-08386 Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Pesticide mixing CITY/TWP Marysville

SIC CODE 2875 SCC CODE _____ EMISSIONS UNIT ID P008

EMISSIONS UNIT DESCRIPTION System 2 blender with carbon adsorber or thermal incinerator

DATE INSTALLED 07/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		2.0 lb/hr	4.0 tpy	2.0 lb/hr	4.0 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination - See additional terms and conditions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08386 Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Pesticide mixing CITY/TWP Marvsville

Emissions Unit ID: T012

SIC CODE 2875 SCC CODE _____ EMISSIONS UNIT ID P020

EMISSIONS UNIT DESCRIPTION Bulk blend mix tanks with carbon adsorber or thermal incinerator(modification to PTI 01-03601, issued February 20, 1992)

DATE INSTALLED 07/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		2.0 lb/hr	4.0 tpy	2.0 lb/hr	4.0 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination - See additional terms and conditions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08386 Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Pesticide mixing CITY/TWP Marvsville

Emissions Unit ID: T012

SIC CODE 2875 SCC CODE EMISSIONS UNIT ID P052

EMISSIONS UNIT DESCRIPTION System 4 blender with carbon adsorber or thermal incinerator(modification to PTI 01-07992, issued June 1, 2000)

DATE INSTALLED 07-01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		2.0 lb/hr	4.0 tpy	2.0 lb/hr	4.0 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination - See additional terms and conditions

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES x NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 01-08386 Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Pesticide mixing CITY/TWP Marvsville

Emissions Unit ID: T012

SIC CODE 2875 SCC CODE _____ EMISSIONS UNIT ID P067

EMISSIONS UNIT DESCRIPTION Bulk blend blending vessel with carbon adsorber or thermal incinerator

DATE INSTALLED 07/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.1 lb/hr	0.6 tpy	0.1 lb/hr	0.6 tpy
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		2.0 lb/hr	6.0 tpy	2.0 lb/hr	6.0 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination - See additional terms and conditions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08386 Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Pesticide mixing CITY/TWP Marvsville

Emissions Unit ID: T012

SIC CODE 2875 SCC CODE _____ EMISSIONS UNIT ID P068

EMISSIONS UNIT DESCRIPTION Bulk blending drum handling, storage and transfer with vented hood and carbon adsorber or thermal incinerator

DATE INSTALLED 07/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		2.0 lb/hr	6.0 tpy	2.0 lb/hr	6.0 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination - See additional terms and conditions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08386 Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Pesticide mixing CITY/TWP Marvsville

Emissions Unit ID: T012

SIC CODE 2875 SCC CODE EMISSIONS UNIT ID P069

EMISSIONS UNIT DESCRIPTION System 1 blender with carbon adsorber or thermal incinerator

DATE INSTALLED 07/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		2.0 lb/hr	4.0 tpy	2.0 lb/hr	4.0 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPS? NESHP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination - See additional terms and conditions

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES x NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SC

PTI Num

FACILITY

Emissions Unit ID: T012

FACILITY DESCRIPTION Pesticide mixing CITY/TWP Marysville

SIC CODE 2875 SCC CODE _____ EMISSIONS UNIT ID P070

EMISSIONS UNIT DESCRIPTION System 3 pesticide blender with carbon adsorber or thermal incinerator

DATE INSTALLED 07/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		2.0 lb/hr	4.0 tpy	2.0 lb/hr	4.0 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination - See additional terms and conditions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

8 NEW SOURCE REVIEW FORM B

PTI Number: 01-08386

Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Pesticide mixing

CITY/TWP Marvsville

Emissions Unit ID: T012

SIC CODE 2875

SCC CODE

EMISSIONS UNIT ID

T012

EMISSIONS UNIT DESCRIPTION Bifenthrin pesticide storage tank

DATE INSTALLED

07/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds			0.19 tpy		0.19 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Subparts A and

NESHAP?

PSD?

OFFSET POLICY?

Kb

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination - See additional terms and conditions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

YES

x NO

IDENTIFY THE AIR CONTAMINANTS: