



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 01-08436

DATE: 10/11/2001

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 **\$1800** 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 01-08436

Application Number: 01-08436
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):

Conveyors, mills, screens, elevators, bins and feeders.

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: 01-08436

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

Facility ID: 0180010008

PTI Application: 01-08436

Issued: To be entered upon final issuance

- 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

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08436

Issued: To be entered upon final issuance

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

6. General Requirements

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

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08436

Issued: To be entered upon final issuance

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

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

The Scotts Co

PTI Application: 01-08436

Issued: To be entered upon final issuance

Facility ID: 0180010008

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 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: 01-08436

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

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08436

Issued: To be entered upon final issuance

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

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

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

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08436

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)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate	20.1
PM10	14.9

11

The Scotts Co

PTI Application: 01-08436

Issued: To be entered upon final issuance

Facility ID: 0180010008

The S

PTI A

Emissions Unit ID: P036

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

The S
PTI A

Emissions Unit ID: P036

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P036 - system 2 granulation drum and process cooler with a cyclone and two baghouses (modification to PTI 01-7992, issued June 1, 2000)	40 CFR Part 52.21 OAC Rule 3745-31-10 through 20 OAC Rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)

OAC rule 3745-17-07(A)(1)

**The S
PTI A**

Emissions Unit ID: P036

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control
Measures

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

See A.II.1. below.

Particulate emissions (PE)
shall not exceed 3.5 pounds
per hour and 15.3 tons per
year.

PE less than 10 microns
(PM10) shall not exceed 2.6
pounds per hour and 11.4
tons per year.

PE from each fabric filter
shall not exceed 0.005
grain/scf.

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

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

See A.II.2. below.

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

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

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

- 2.a** There shall be no visible fugitive particulate emissions escaping from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** The above emission limitations of 3.5 pounds PE per hour and 2.6 pounds PM10 per hour were established to reflect the potential to emit for this emissions unit when vented to the baghouses. Therefore, the parametric monitoring of the baghouses as established in the following terms and conditions will ensure compliance with these limits.

II. Operational Restrictions

- a. The permittee shall operate each baghouse whenever this emissions unit is in operation.
- b. The pressure drop across each baghouse shall be maintained within the range of 0.5-15.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. This permittee shall operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, inspected and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The facility shall record the pressure drop across each baghouse at least once per each operating shift of the emissions unit.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the visible emissions;
- d. the total duration of any visible emission incident; and

- e. any corrective actions taken to eliminate the visible emissions.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the cause of the visible fugitive emissions;
- c. the total duration of any visible fugitive emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. In accordance with paragraph A.1. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports for all exceedances during which the pressure drop across each baghouse did not comply with the allowable range specified in Section A.II.2 above, and any actions taken to return the pressure drop to a compliant operating range.
2. In accordance with paragraph A.1. of the General Terms and Conditions the permittee shall submit quarterly written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.
3. In accordance with paragraph A.1. of the General Terms and Conditions, the permittee shall submit quarterly written reports which (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitations:
PE shall not exceed 3.5 pounds per hour and 15.3 tons per year. PM10 emissions shall not exceed 2.6 pounds per hour and 11.4 tons per year.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 limitation, the permittee

Issued: To be entered upon final issuance

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 emission 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): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

To demonstrate compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the maximum annual hours of operation of 8,760. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual particulate and PM10 emission in tons.

- b. Emissions Limitation:
PE from each fabric filter shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Compliance shall be determined through emissions testing required in Section V.1.a. of this permit.

- c. Emission Limitation:
There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996, and

Emissions Unit ID: P036

the modifications listed in paragraphs (B)(4)(a), (B)(4)(b) and (B)(4)(c) of OAC rule 3745-17-03.

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

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

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.

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P036 - system 2 granulation drum and process cooler with a cyclone and two baghouses	OAC 3475-31-05(D)	NH ₃ emissions shall not exceed 88.0 pounds per hour.

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

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

Emissions Limitation:

NH₃ emissions shall not exceed 88.0 pounds per hour.

Issued: To be entered upon final issuance**Applicable Compliance Method:**

Emissions testing was conducted for this emissions unit in 1998. The emissions test showed compliance with the emission limitation for this emissions unit.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Modified Method 5. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P071 - System 2 raw material and product handling, milling, and screening with baghouse	40 CFR Part 52.21 OAC Rule 3745-31-10 through 20 OAC Rule 3745-31-05(A)(3)	See A.II.1. below. Particulate emissions (PE) shall not exceed 1.1 pounds per hour and 4.8 tons per year. PE less than 10 microns (PM10) shall not exceed 0.8 pound per hour and 3.5 tons per year. PE from the fabric filter shall not exceed 0.005 grain/scf. There shall be no visible fugitive particulate emissions escaping from the building housing this emissions unit. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-10 through 20. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as exempted by rule.
	OAC rule 3745-17-07(A)(1)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3) and 3745-31-10 through 20.

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

- 2.a** There shall be no visible fugitive particulate emissions escaping from the building housing this emissions unit. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.
- 2.b** The above emission limitations of 1.1 pounds PE per hour and 0.8 pound PM10 per hour were established to reflect the potential to emit for this emissions unit when vented to a baghouse. Therefore, the parametric monitoring of the baghouse as established in the following terms and conditions will ensure compliance with these limits.

II. Operational Restrictions

1. The permittee shall operate the baghouse whenever this emissions unit is in operation.
2. The pressure drop across the baghouse serving this emissions unit shall be maintained within the range of 0.5-15.0 inches of water column while the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. This facility shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be 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 baghouse at least once per each operating shift of the emissions unit.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;

Issued: To be entered upon final issuance

- d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
 3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. In accordance with paragraph A.1. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports for all exceedances during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2 above, and any actions taken to return the pressure drop to a compliant operating range.
2. In accordance with paragraph A.1. of the General Terms and Conditions the permittee shall submit quarterly written reports which (a) identify all days during which any visible particulate emissions were observed from the stack of this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.
3. In accordance with paragraph A.1. of the General Terms and Conditions, the permittee shall submit quarterly written reports which (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points of the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

V. Testing Requirements

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

Emissions Unit ID: P071

determined in accordance with the following methods:

- a. Emission Limitation:
PE shall not exceed 1.1 pounds per hour and 4.8 tons per year. PM10 emissions shall not exceed 0.8 pound per hour and 3.5 tons per year.

Applicable Compliance Method:

To determine compliance with the hourly particulate and PM10 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): 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for particulate emissions and Method 201 or 201A for PM10 emissions. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

To demonstrate compliance with the annual limitations, the permittee shall multiply the hourly emission rates determined through the testing required above by the maximum annual hours of operation of 8,760. The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual particulate and PM10 emission in tons.

- b. Emissions Limitation:
PE from the fabric filter shall not exceed 0.005 grain/scf.

Applicable Compliance Method:

Compliance shall be determined through emissions testing required in Section V.1.a. of this permit.

- c. Emission Limitation:
There shall be no visible fugitive particulate emissions from the building housing this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible observations of the non-stack

Issued: To be entered upon final issuance

egress points from the building housing this emissions unit in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

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

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1996.

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.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P071 - System 2 raw material and product handling, milling, and screening with baghouse	None	None

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

NEW SOURCE REVIEW FORM B

PTI Number: 01-08436 Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Conveyors, mills, screens, elevators, bins and feeders. CITY/TWP Marysville

SIC CODE 2875 SCC CODE _____ EMISSIONS UNIT ID P036

EMISSIONS UNIT DESCRIPTION system 2 granulation drum and process cooler with a cyclone and two baghouses (modification to PTI 01-7992, issued June 1, 2000)

DATE INSTALLED 10/01

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		3.5 lb/hr	15.3 tpy	3.5 lb/hr	15.3 tpy
PM ₁₀		2.6 lb/hr	11.4 tpy	2.6 lb/hr	11.4 tpy
Sulfur Dioxide					
Organic Compounds					
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*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Modeling performed for particulate for a previously issued PSD permit (01-7992).

28 NEW SOURCE REVIEW FORM B

PTI Number: 01-08436

Facility ID: 0180010008

FACILITY NAME The Scotts Co

FACILITY DESCRIPTION Conveyors. mills. screens. elevators. bins CITY/TWP Marvsville

Emissions Unit ID: P071

SIC CODE 2875

SCC CODE

EMISSIONS UNIT ID

P071

EMISSIONS UNIT DESCRIPTION System 2 raw material and product handling, milling, and screening with baghouse

DATE INSTALLED

10/01

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		1.1 lb/hr	4.8 tpy	1.1 lb/hr	4.8 tpy
PM ₁₀		0.8 lb/hr	3.5 tpy	0.8 lb/hr	3.5 tpy
Sulfur Dioxide					
Organic Compounds					
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*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Modeling performed for particulate for a previously issued PSD permit (01-7992).