



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 01-08386**

**DATE: 3/4/2004**

The Scotts Co  
Todd Trowbridge  
14111 Scottslawn Rd  
Marysville, OH 43026

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 3/4/2004  
Effective Date: 3/4/2004**

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08386**

Application Number: 01-08386  
APS Premise Number: 0180010008  
Permit Fee: **\$700**  
Name of Facility: The Scotts Co  
Person to Contact: Todd Trowbridge  
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):  
**Bulk blend operations.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable 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.9 below if no deviations occurred during the quarter.

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

## 2. Scheduled Maintenance/Malfunction Reporting

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

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

## 3. Risk Management Plans

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

## 4. Title IV Provisions

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

## 5. Severability Clause

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

declared invalid.

## **6. General Requirements**

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

## **7. Fees**

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

## **8. Federal and State Enforceability**

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

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

## 9. Compliance Requirements

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

**10. 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 ninety (90) 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.

**12. 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.

**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**

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. Termination of Permit To Install**

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

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

## **5. 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.

## **6. 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.

## **7. Applicability**

The Scotts Co

Facility ID: 0180010008

PTI Application: 01-08386

**Modification Issued: 3/4/2004**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **8. 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.

Emissions Unit ID: P106

**9. 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>
OC	30.2 tpy
Particulate	0.6 tpy

12

The Scotts Co

PTI Application: **01-08386**

**Modification Issued: 3/4/2004**

Facility ID: **0180010008**

13

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PTI A<sub>1</sub>

**Modification Issued: 3/4/2004**

Emissions Unit ID: P106

**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

**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>
P020 - Bulk blend pesticide mix tanks with carbon adsorber (modification)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.3 pounds per hour and 6.0 tons per year.
	OAC rule 3745-31-05 (C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C).
	OAC rule 3745-21-07(G)(2)	See I.2.b and II.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).

**2. Additional Terms and Conditions**

- 2.a The above OC emission limitation of 1.3 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a carbon adsorber when using liquid bifenthrin. Therefore, the monitoring of the organic compound control equipment as established in the following terms and conditions will ensure compliance with these limits when using liquid bifenthrin. The OC emissions from all other pesticides blended in this emissions unit are able to meet the 1.3 pounds per hour limitation at potential to emit without use of the carbon adsorber.
- 2.b OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067 through P070, and P020 combined.

**Modification Issued: 3/4/2004****II. Operational Restrictions**

1. The permittee shall properly install, operate, and maintain a carbon adsorber to capture OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is using liquid bifenthrin.
2. The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (1.04 pounds/hour or 55 ppm).

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

1. The permittee shall maintain monthly records of the following information:
  - a. the total production rate of P020 in tons;
  - b. the total OC emissions for emission unit P020 using the following equation:  
(OC emission rate\* in pounds OC per ton of production) x (the production of the emission unit required by Section III.1.a. above);  
  
\* The OC emission rate for liquid bifenthrin use was established by an emissions test conducted on May 21, 2002 on similar emissions units P069, P070, and P106 (System 1,2, and 3 blenders) and the OC emission rate for other pesticides was established by an emissions test for the "worst case" pesticide (Prowl) conducted on July 10, 2001.
  - c. 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 P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.; and
  - d. 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 P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.
2. The permittee shall properly operate and maintain equipment to monitor the outlet gases of the activated carbon of the carbon adsorber. The equipment shall be a currently approved Method 21 compliant monitoring device (40 CFR Part 60, Appendix A). The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month bifenthrin is being blended, the permittee shall collect and record the following information on a biweekly basis:

- a. The OC concentration of the outlet gas from the activated carbon in ppm. The permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device records several concentrations;
- b. The production rate of the emission unit at the time the OC concentration is recorded; and
- c. If the concentration exceeds 55 ppm, a record indicating when the activated carbon was replaced.

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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
2. The permittee shall submit quarterly reports which identify all days in which the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm when biweekly monitoring was required because of the use of liquid bifenthrin. The report shall also include each day the activated carbon was replaced. These reports shall be submitted in accordance with Section A.I.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 carbon adsorber was not in service when the emissions unit was using liquid bifenthrin. 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.

#### **V. 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 1.3 pounds per hour and 6.0 tons per year.

**Applicable Compliance Method:**

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appedix A, Methods 1-4 and Method 25 or 25A. Alternative U.S. EPA-approved test may be used with prior approval from the Ohio EPA.

Emissions Unit ID: P020

Emissions testing was conducted on a similar emissions unit (System 1, 2, and 3 blenders) on May 21, 2002. The emissions test demonstrated compliance with the emission limitation for this emissions unit.

To demonstrate compliance with the annual limitation, the permittee may multiply the hourly emission rates determined through the testing 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 OC emission in tons.

- b. Emissions Limitation:  
OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units 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 III.1. of this permit.

## **VI. Miscellaneous Requirements**

None

**Modification Issued: 3/4/2004**

**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 (modification)	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

19

The Scotts Co  
PTI Application: 01 00206  
**Modif**

Facility ID: 0180010008

Emissions Unit ID: P020

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment	<u>Applicable Rules/Requirements</u>	
P067 - Bulk blend blending vessel with fabric filter and carbon adsorber (modification)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
	OAC rule 3745-31-05 (C)	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions  
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 1.3 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 (C).

See I.2.c and II.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).

**2. Additional Terms and Conditions**

**2.a** The above OC emission limitation of 1.3 pounds per hour was established to reflect the

**Modification Issued: 3/4/2004**

potential to emit for this emissions unit as vented to a carbon adsorber when using liquid bifenthrin. Therefore, the monitoring of the carbon adsorber as established in the following terms and conditions will ensure compliance with these limits when using liquid bifenthrin. The OC emissions from all other pesticides blended in this emissions unit are able to meet the 1.3 pounds per hour limitation at potential to emit without use of the carbon adsorber.

- 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** OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067 through P070, and P020 combined.

**II. Operational Restrictions**

1. The permittee shall properly install, operate, and maintain a carbon adsorber to capture OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is using liquid bifenthrin.
2. The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (1.04 pounds/hour or 55 ppm).
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.

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

1. The permittee shall maintain monthly records of the following information:
  - a. the total production rate of P067 in tons;
  - b. the total OC emissions for emission unit P067 using the following equation:  
(OC emission rate\* ) x (the production of the emission unit required by Section III.1.a. above);

\* The OC emission rate for liquid bifenthrin use was established by an emissions test conducted on May 21, 2002 for similar emissions units P069, P070, and P106 (System 1, 2, and 3 blenders) and the OC emission rate for other pesticides was

**Modification Issued: 3/4/2004**

established by an emissions test for the "worst case" pesticide (Prowl) conducted on July 10, 2001.

- c. 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 P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.; and
  - d. 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 P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.
2. The permittee shall properly operate and maintain equipment to monitor the outlet gases of the activated carbon of the carbon adsorber. The equipment shall be a currently approved Method 21 compliant monitoring device (40 CFR Part 60, Appendix A). The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month bifenthrin is being blended, the permittee shall collect and record the following information on a biweekly basis:

- a. The OC concentration of the outlet gas from the activated carbon in ppm. The permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device records several concentrations;
  - b. The production rate of the emission unit at the time the OC concentration is recorded; and
  - c. If the concentration exceeds 55 ppm, a record indicating when the activated carbon was replaced.
3. 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.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances

Emissions Unit ID: P067

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

2. The permittee shall submit quarterly reports which identify all days in which the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm when biweekly monitoring was required because of the use of liquid bifenthrin. The report shall also include each day the activated carbon was replaced. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
3. The permittee shall submit quarterly 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.I.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 was not in service when the emissions unit was in operation and/or when the carbon adsorber was not in service when the emissions unit was using liquid bifenthrin. 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.

## V. Testing Requirements

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

- a. Emission Limitation:

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 particulate 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 2.5 years of the issuance of this permit.
- 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 1-5 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 particulate limitation, the permittee shall multiply the particulate emission rate in pounds per hour determined through the testing required above by the maximum hours of operation (8,760 hours). The resulting emission rate shall be divided by 2,000 pounds per ton to obtain the annual particulate emissions in tons.

- b. Emission Limitation:  
 OC emissions shall not exceed 1.3 pounds per hour and 6.0 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appedix A, Methods 1-4 and Method 25 or 25A. Alternative U.S. EPA-approved test may be used with prior approval from the Ohio EPA.

Emissions testing was conducted on a similar emissions unit (System 1, 2, and 3 blenders) on May 21, 2002. The emissions test demonstrated compliance with the emission limitation for this emissions unit.

To demonstrate compliance with the annual limitation, the permittee may multiply the hourly emission rates determined through the testing 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 OC emission in tons.

- c. Emissions Limitation:  
 OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P106, 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 III.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).

26

The Sc

PTI A<sub>1</sub>

**Modification Issued: 3/4/2004**

Emissions Unit ID: P067

**Modification Issued: 3/4/2004**

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

**Modification Issued: 3/4/2004**

**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 (modification)	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

29

The Scotts Co

PTI Application: 01 00206

**Modif**

Facility ID: 0180010008

Emissions Unit ID: P067

**Modification Issued: 3/4/2004**

**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>
P068 - Bulk blending drum handling, storage and transfer operations with vented hood and carbon adsorber (modification)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.3 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(C).
	OAC rule 3745-31-05 (C)	See I.2.b and II.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).

**2. Additional Terms and Conditions**

- 2.a The above OC emission limitation of 1.3 pounds per hour was established to reflect the potential to emit for this emissions unit as vented to a carbon adsorber when using bifenthrin. Therefore, the monitoring of the carbon adsorber as established in the following terms and conditions will ensure compliance with these limits when using liquid bifenthrin. The OC emissions from all other pesticides blended in this emissions unit are able to meet

**Modification Issued: 3/4/2004**

the 1.3 pounds per hour limitation at potential to emit without use of the carbon adsorber.

- 2.b** OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P067 through P070, and P020 combined.

**Modification Issued: 3/4/2004****II. Operational Restrictions**

1. The permittee shall properly install, operate, and maintain a carbon adsorber to capture OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is using liquid bifenthrin.
2. The activated carbon shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted OC limitation above (1.04 pounds/hour or 55 ppm).

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

1. The permittee shall maintain monthly records of the following information:
  - a. the total production rate of P068 in tons;
  - b. the total OC emissions for emission unit P068 using the following equation:  
(OC emission rate\* in pounds OC per ton of production) x (the production of the emission unit required by Section III.1.a. above);  
  
\* The OC emission rate for liquid bifenthrin use was established by an emissions test conducted on May 21, 2002 on similar emission units P069, P070, and P106 (System 1, 2, and 3 blenders) and the OC emission rate for other pesticides was established by an emissions test for the "worst case" pesticide (Prowl) conducted on July 10, 2001.
  - c. 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 P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.; and
  - d. 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 P067 through P070 and P020 combined calculated by summing the total OC emissions for each unit recorded in Section III.1.b.
2. The permittee shall properly operate and maintain equipment to monitor the outlet gases of the activated carbon of the carbon adsorber. The equipment shall be a currently approved Method 21 compliant monitoring device (40 CFR Part 60, Appendix A). The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

For each month bifenthrin is being blended, the permittee shall collect and record the following information on a biweekly basis:

- a. The OC concentration of the outlet gas from the activated carbon in ppm. The permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device records several concentrations;
- b. The production rate of the emission unit at the time the OC concentration is recorded; and
- c. If the concentration exceeds 55 ppm, a record indicating when the activated carbon was replaced.

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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month cumulative OC emission limitation for emissions units P067 through P070 and P020 combined. These reports shall be submitted in accordance with Section A.I.1. of the General Terms and Conditions of this permit.
2. The permittee shall submit quarterly reports which identify all days in which the OC concentration of the outlet gas of the carbon adsorber exceeded 55 ppm when biweekly monitoring was required because of the use of liquid bifenthrin. The report shall also include each day the activated carbon was replaced. These reports shall be submitted in accordance with Section A.I.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 carbon adsorber was not in service when the emissions unit was using liquid bifenthrin. 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.

#### **V. 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 1.3 pounds per hour and 6.0 tons per year.

**Applicable Compliance Method:**

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appedix A, Methods 1-4 and Method 25 or 25A. Alternative U.S. EPA-approved test may be used with prior approval from the Ohio EPA.

**Modification Issued: 3/4/2004**

Emissions testing was conducted on a similar emissions unit (System 1, 2, and 3 blenders) on May 21, 2002. The emissions test demonstrated compliance with the emission limitation for this emissions unit.

To demonstrate compliance with the annual limitation, the permittee may multiply the hourly emission rates determined through the testing 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 OC emission in tons.

- b. Emissions Limitation:  
OC emissions shall not exceed 30.2 tons per rolling, 12-month summation from emissions units P106, 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 III.1. of this permit.

**VI. Miscellaneous Requirements**

None

**Modification Issued: 3/4/2004**

**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>
P068 - Bulk blending drum handling, storage and transfer with vented hood and carbon adsorber	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**

36

The Scotts Co

PTI Application: 01 00206

**Modif**

Facility ID: 0180010008

Emissions Unit ID: P068

None

**Modification Issued: 3/4/2004**

**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>
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.

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

38

The Sc

PTI A<sub>1</sub>

**Modification Issued: 3/4/2004**

Emissions Unit ID: T012

None

**Modification Issued: 3/4/2004****V. 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:

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.

**VI. 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

40

The Sc

PTI A<sub>1</sub>

**Modification Issued: 3/4/2004**

Emissions Unit ID: T012

and

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

**Modification Issued: 3/4/2004**

**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>
T012 - Bifenthrin pesticide storage tank	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

42

The Scotts Co

PTI Application: 01 00206

**Modif**

Facility ID: 0180010008

Emissions Unit ID: T012