



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
ASHTABULA COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 02-14024

DATE: 2/20/2001

Millennium Inorganic Chemicals Inc Plt2
Dianna Henslee
P.O. Box 310 2426 Middle Rd
Ashtabula, OH 44004

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 2/20/2001

FINAL PERMIT TO INSTALL 02-14024

Application Number: 02-14024
APS Premise Number: 0204010193
Permit Fee: **\$800**
Name of Facility: Millennium Inorganic Chemicals Inc Pt2
Person to Contact: Dianna Henslee
Address: P.O. Box 310 2426 Middle Rd
Ashtabula, OH 44004

Location of proposed air contaminant source(s) [emissions unit(s)]:
2426 Middle Rd
Ashtabula, Ohio

Description of proposed emissions unit(s):
Replacement of 27.5 mmBtu natural gas burner with 37 mmBtu/hr natural gas fired burner on pigment dryer #2 (BA-946) at titanium dioxide slurry process (P901).

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

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.11 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 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.

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Air Pollution Nuisance

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

5. Termination of Permit To Install

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

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>Total Tons Per Year</u>	<u>Tons Per Year Increase</u>
PE/PM ₁₀	27.31	0.92
CO	29.7	25.6
NO _x	19.3	6.3

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>
P012 - TiO ₂ paste feed tank (FE-917), No. 1 TiO ₂ paste drier (FF-919) and 21 mmBtu/hr natural gas fired burner (BA-918) with two baghouses (FD-921A & FD-921B) MODIFICATION	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 4.0 lbs/hr and 17.5 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-17-11	See A.I.2.a.

2. Additional Terms and Conditions

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

II. Operational Restrictions

- 1. The permittee shall burn only natural gas in the No.1 TiO₂ paste dryer burner (BA-918).
- 2. The pressure drop across each of the baghouses (FD-921A & FD-921B) shall each be maintained within the range recommended by the manufacturer while the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in the No. 1 TiO₂ paste dryer burner (BA-918).

Issued: 2/20/2001

2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across each baghouse (FD-921A & FD-921B) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per eight-hour shift basis.
3. The total number of hours the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day when a fuel other than natural gas was burned in the No.1 TiO₂ paste dryer burner (BA-918);
 - b. An identification of each recorded reading during which the pressure drop across baghouses (FD-921A & FD-921B) did not comply with the allowable range specified in Section A.II.2.

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 20% opacity of visible particulate emissions.

Applicable Compliance Method:
Compliance shall be determined based upon
OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 4.0 lbs PE/hr.

Applicable Compliance Method: To determine the actual worst case emission rate for PE, the following equation may be used:

Emissions Unit ID: P012

E_{PE} = summation of [Q_{ds} x (PE_grain load) x (1 lb PE/7000 grains PE) x (60 min/hr)].

Where the following applies:

E_{PE} = PE rate, in pounds per hour.

Q_{ds} = dry, standard actual exhaust flow from final egress point (CB-925), 15,574 dry standard cubic feet per minute (dscfm), from a stack test conducted on July 29, 1999.

PE grain load = maximum particulate load from dust control device(s) 0.0025 grains PE/dscf, from a stack test conducted on July 29, 1999.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- c. Emission Limitation: 17.5 TPY PE

Applicable Compliance Method: To determine the annual rate for PE, the actual, hourly, worst case emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, which is the sum of the daily operating hours, as required in the record keeping in section A.III.3., for the calendar year, and divided by 2000 lbs/ton.

VI. Miscellaneous Requirements

Newly designated emissions unit, P012, was previously associated with emissions unit, (P901) Titanium dioxide finishing operations.

Issued: 2/20/2001

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>
P012 - TiO ₂ paste feed tank (FE-917), No. 1 TiO ₂ paste drier (FF-919) and 21 mmBtu/hr natural gas fired burner (BA-918) with two baghouses (FD-921A & FD-921B) MODIFICATION		Compliance with the Air Toxic Policy as specified in section B.III1.

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions increase for each toxic compound and each criteria pollutant will be less than 1.0 ton and less than the "Ohio Modeling Significant Emission Rate", respectively, as noted in Table 3 of Division of Air Pollution Control Engineering Guide #69. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year or would cause emissions of any criteria pollutant above the "Ohio

16

Millen

PTI A₁

Issued: 2/20/2001

Emissions Unit ID: P012

Modeling Significant Emission Rate" may require the permittee to apply for and obtain a new permit to install.

IV. Reporting Requirements

None.

17

Millen

PTI A₁

Issued: 2/20/2001

Emissions Unit ID: P012

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - TiO ₂ paste feed tank (FA-614), No. 2 TiO ₂ paste drier (FF-946) and 37 mmBtu/hr natural gas fired burner (BA-946) with baghouse (FD-946) MODIFICATION	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.24 lbs/hr and 9.81 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). Carbon monoxide (CO) emissions shall not exceed 6.78 lbs/hr and 29.7 tons/yr. Nitrogen oxide (NO _x) emissions shall not exceed 4.40 lbs/hr and 19.3 tons/yr.
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-17-11	See A.I.2.a.

2. Additional Terms and Conditions

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

II. Operational Restrictions

1. The permittee shall burn only natural gas in the No.2 TiO₂ paste dryer burner (BA-946).

Issued

Emissions Unit ID: P013

2. The pressure drop across the baghouse (FD-946) shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in the No. 2 TiO₂ paste dryer burner (BA-946).
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse (FD-946) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per eight-hour shift basis.
3. The total number of hours the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day when a fuel other than natural gas was burned in the No.2 TiO₂ paste dryer burner (BA-946);
 - b. An identification of each day during which the pressure drop across baghouse (FD-946) did not comply with the allowable range specified in Section A.II.2.

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

V. Testing Requirements

1. Compliance with the allowable emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 20% opacity of visible particulate emissions.

Applicable Compliance Method: Compliance shall be determined based upon OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 2.24 lbs PE/hr.

Applicable Compliance Method: To determine the actual worst case emission rate for PE, the following equation may be used:

$$E_{PE} = \text{summation of } [Q_a \times 528 / (T_a + 459.67) \times (1 - M/100) \times (PE_{\text{grain load}}) \times (1 \text{ lb PE} / 7000 \text{ grains PE}) \times (60 \text{ min/hr})].$$

Where the following applies:

E_{PE} = PE rate, in pounds per hour.

Q_a = actual exhaust flow from final egress point (CB-945), 45,000 actual cubic feet per minute (acfm) is maximum design flow as noted in the permit application.

T_a = actual exhaust gas temperature, 300 degrees Fahrenheit, from engineering estimates in the permit application.

M = moisture content of exhaust flow, 24 percent by volume, from engineering estimates in the permit application.

PE grain load = maximum particulate load from dust control device, 0.01 grains PE/dscf, from baghouse manufacturer specifications as noted in the permit application.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- c. Emission Limitation: 9.81 TPY PE

Applicable Compliance Method: To determine the annual rate for PE, the actual, hourly, worst case emission rate as determined in section A.V.1.b. shall be multiplied by the actual hours of operation, which is the sum of the daily operating hours, as required in the record keeping in section A.III.3., for the calendar year, and divided by 2000 lbs/ton.

- d. Emission Limitation: 6.78 lbs/hr CO

Applicable Compliance Method: To determine the actual, hourly worst case CO emission rate the following equation shall be used:

Issued

Emissions Unit ID: P013

$$E_{\text{CO}} = Q \times \text{CO} \times 1\text{ppm}/1,000,000 \text{ parts} \times 28 \text{ gram CO/mole CO} \times 1 \text{ lb CO}/453.59 \text{ gram CO} \\ \times 60 \text{ min/hr.}$$

Where the following applies:

E_{CO} = CO emissions, in pounds per hour.

Q = exhaust flow, which is 23760 dscf./min, as noted in the application for PTI 02-14024.

CO = CO concentration in exhaust flow, which is 70 ppm, based upon manufacturer specifications.

- e. Emission Limitation: 29.7 TPY CO

Applicable Compliance Method: To determine the actual, annual CO emissions, the worst case hourly rate, E_{CO} , as determined from the equation as noted in section A.V.1.e., is multiplied by the actual, annual hours of operation, as required in the record keeping specified in section A.III.3., and divided by 2000 lbs per ton.

- f. Emission Limitation: 4.40 lbs/hr NO_x

Applicable Compliance Method: To determine the actual, hourly worst case NO_x emission rate the following equation shall be used:

$$E_{NO_x} = \text{Btu/hr} \times \text{EF}$$

E_{NO_x} = NO_x emissions, in pounds per hour.

Btu = maximum, hourly heat input, which is 37 mmBtu, based on manufacturer's specification.

EF = NO_x emission factor, which is 0.108 lb NO_x/mmBtu of actual heat input, based upon manufacturer's specification.

- g. Emission Limitation: 19.3 TPY NO_x

Applicable Compliance Method: To determine the actual, annual NO_x emissions, the worst case hourly rate, E_{NO_x} , as determined from the equation as noted in section A.V.1.f., is multiplied by the actual, annual hours of operation, as required in the record keeping specified in section A.III.3., and divided by 2000 lbs per ton.

VI. Miscellaneous Requirements

Newly designated emissions unit, P013, was previously associated with emissions unit, (P901) Titanium dioxide finishing operations.

Issued: 2/20/2001

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>
P013 - TiO ₂ paste feed tank (FA-614), No. 2 TiO ₂ paste drier (FF-946) and 37 mmBtu/hr natural gas fired burner (BA-946) with baghouse (FD-946) MODIFICATION		Compliance with the Air Toxic Policy as specified in section B.III1.

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions increase for each toxic compound and each criteria pollutant will be less than 1.0 ton and less than the "Ohio Modeling Significant Emission Rate", respectively, as noted in Table 3 of Division of Air Pollution Control Engineering Guide #69. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year or would cause emissions of any criteria pollutant above the "Ohio

25

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PTI A₁

Issued: 2/20/2001

Emissions Unit ID: P013

Modeling Significant Emission Rate" may require the permittee to apply for and obtain a new permit to install.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

NEW SOURCE REVIEW FORM B

PTI Number: 02-14024

Facility ID: 0204010193

FACILITY NAME Millennium Inorganic Chemicals Inc. - Plant 2

FACILITY DESCRIPTION titanium dioxide pigment & slurry mfg. CITY/TWP Ashtabula

SIC CODE 2816 SCC CODE 3-01-035-53 EMISSIONS UNIT ID P012

EMISSIONS UNIT DESCRIPTION TiO2 paste feed tank (FE-917), TiO2 paste drier No. 1 (FA-919) & 21 mmBtu/hr natural gas fired burner (BA-918) with two baghouses (FD-921A & FD-921B) -
MODIFICATION

DATE INSTALLED NA, no physical change

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	Attainment	0.33 lb/hr	1.44	4.0 lbs/hr	17.5
PM ₁₀	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment				
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics	Unclassified				

APPLICABLE FEDERAL RULES:

NSPS? NA

NESHAP? NA

PSD? NA

OFFSET POLICY? NA

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

Enter Determination Original BAT determination was 0.03 grains PE/dscf as noted in PTI 02-1545 and was converted to a lb PE/hr limit to conform to lb/hr limits in applicable rule OAC rule 3745-17-11. Also annual PE limit is included & is based on original BAT of 0.03 grains PE/dscf x maximum flow rate.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$0, already installed.

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA.

28 NEW SOURCE REVIEW FORM B

PTI Number: 02-14024 Facility ID: 0204010193
 FACILITY NAME Millennium Inorganic Chemicals Inc. - Plant 2
 FACILITY DESCRIPTION titanium dioxide pigment & slurry mfg CITY/TWP Ashtabula

Emissions Unit ID: P013

SIC CODE 2816 SCC CODE 3-01-035-53 EMISSIONS UNIT ID P013

EMISSIONS UNIT DESCRIPTION TiO2 paste feed tank (FA-614), TiO2 paste drier No. 2 (FF-946) & 37 mmBtu/hr natural gas fired burner (BA-946) with baghouse FD-946 - MODIFICATION

DATE INSTALLED 12/31/01

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	Attainment	1.84 lbs/hr	8.06	2.24 lbs/hr	9.81
PM ₁₀	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment				
Nitrogen Oxides	Attainment	3.60 lbs/hr	15.8	4.40 lbs/hr	19.3
Carbon Monoxide	Attainment	5.54 lbs/hr	24.3	6.78 lbs/hr	29.7
Lead	Attainment				
Other: Air Toxics	Unclassified				

APPLICABLE FEDERAL RULES:

NSPS? NA NESHAP? NA PSD? NA OFFSET POLICY? NA

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

Enter Determination BAT limit in PTI 02-8530 was 0.01 grains PE/dscf which was converted to a lb PE/hr limit, by multiplying 0.01 grains PE/dscf by increased stack gas flow rate, to conform to lb PE /hr limit in applicable OAC rule 3745-17-11. Annual PE limit based on allowable rate of 2.24 lbs/hr is included. NO_x & CO emissions increases based on manufacturer specifications for new 37 mmBtu/hr natural gas fired burner and multiplied by 110% to allow for a conservative estimate.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO.
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$0, already installed.

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA.

NEW SOURCE REVIEW FORM B

PTI Number: 02-14024

Facility ID: 0204010193

FACILITY NAME Millennium Inorganic Chemicals Inc. - Plant 2

FACILITY DESCRIPTION titanium dioxide pigment & slurry mfg CITY/TWP Ashtabula

Emissions Unit ID: P013

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<input checked="" type="checkbox"/>	0214024c.wpd	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Total Tons Per Year</u>	<u>Tons Per Year Increase</u>
PE/PM ₁₀	27.31	0.92
CO	29.7	25.6

30 NEW SOURCE REVIEW FORM B

PTI Number: 02-14024

Facility ID: 0204010193

FACILITY NAME Millennium Inorganic Chemicals Inc. - Plant 2

FACILITY DESCRIPTION titanium dioxide pigment & slurry mfg

CITY/TWP Ashtabula

Emissions Unit ID: P013

NO_x

19.3

6.3