

Facility ID: 0335010023 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0335010023 Emissions Unit ID: P006 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
5,000 gallon liquid insecticide blender with condenser	OAC rule 3745-31-05 (PTI #03-10139, issued 7/30/97) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-01(C)(5)	8.0 lbs organic compounds (OC)/hr, 40.0 lbs OC/day, and 7.3 tons OC/yr The emission limitation established pursuant to this rule is equivalent to the limitation established pursuant to OAC rule 3745-31-05. See A.2.a.

2. **Additional Terms and Conditions**
 - (a) Liquid insecticides blended in emissions unit P006 are "photochemically reactive" as defined in Ohio Administrative Code (OAC) rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall install, operate, and maintain the condenser for Ohio EPA emissions unit P006 in accordance with the manufacturer's recommendations, instructions, and operating manuals.
2. For Ohio EPA emissions unit P006, the average temperature of the exhaust gases from the condenser during any 3-hour block of time shall not be greater than 75 degrees Fahrenheit, plus or minus 5 degrees Fahrenheit (as supplied by the permittee).
3. This permit allows the use of coating and cleanup materials specified by the permittee in the application for PTI number 03-10139. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxics Policy" was applied for the pollutant based on the SCREEN 3 model and comparing the predicted 1- hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant:

Pollutant: Chlorpyrifos

TLV (ug/m3): 2,000

maximum hourly emission rate (lbs/hr): 0.63

predicted 1 hour maximum ground-level concentration at the fence line (ug/m3): 14.53

maximum acceptable ground-level concentration (MAGLC) (ug/m3): 47.6

4. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification": changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted;
 changes in the composition of the materials, or use of new materials, that would result in an increase in emission of any pollutant that has a listed TLV.

5. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a PTI, if the following conditions are met:
 the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 the permittee can continue to comply with the allowable emission limitations specified in its permit to install;
 prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
6. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-34-01, the permittee shall obtain a final permit to install prior to the change.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when emissions unit P006 is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
2. The permittee shall collect and record the following information each day:
 - a. the average temperature of the exhaust gases from the condenser during each of the 8, 3-hour blocks of time during the day;
 - b. a log or record of operating time for the capture (collection) system, monitoring equipment, and the associated emissions unit;
3. The permittee shall collect and record the following information each day to demonstrate compliance with OAC rule 3745-21-09(G)(2), 8 pounds per hour, 40 pounds OC per day:
 - a. The company identification of liquid insecticide blended;
 - b. the number of gallons of each liquid insecticide blended per day;
 - c. the organic compound content of each liquid insecticide blended, in pounds per gallon;
 - d. the total organic compound emission rate for all liquid insecticides blended, in pounds per day;
 - e. the total number of hours per day the emissions unit was in operation;
 - f. the average hourly organic compound emission rate for each liquid insecticide blended, i.e., (d)/(e), in pounds per hour (average).
4. These records shall be maintained in the company's files at the facility for a period of at least five years and shall be available for inspection, upon request, by personnel for the Ohio EPA.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emission unit P006 within five calendar days of any exceedance which include the following information:
 an identification of each day during which the average hourly organic compound emission rate exceeded 8 pounds per hour, and the actual average hourly organic compound rate for each such day.
 an identification each day during which the organic compound emission rate exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in condition (B)(2) above.
3. All reports, notifications, etc., required by the above terms and conditions are to be submitted to the Ohio Environmental Protection Agency, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio, 43402.

E. Testing Requirements

1. Emission Limitation: 8 lbs OC/hour
 Applicable Compliance Method: To determine the average hourly organic compound emissions rate, the following equation shall be used:

$$E = OC / H$$

E = average hourly organic compound emission rate, in pounds per hour
OC = daily organic compound emission rate, in pounds per day
H = number of hours the emissions unit was in operation
Emission Limitation: 40 pounds OC/day

Applicable Compliance Method: To determine the total daily organic compound emissions rate from all liquid insecticides blended, the following equation shall be used:

$$E = [OC \times G] \times (1-CE)$$

E = total daily organic compound emission rate, in pounds per day
OC = organic compound content of liquid insecticide blended, in pounds per gallon
G = number of gallons of liquid insecticide blended, in gallons per day
CE = fractional control efficiency of condenser (permittee supplied a control efficiency of 77.6 percent)
Emission Limitation: 7.3 tons OC/yr

Applicable Compliance Method: The annual emission limitation was established by multiplying the daily limitation by 365 days per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the daily mass emission limitation, compliance with the annual limitation will be assumed.

2. Any determination of OC content (OC content means all the organic compounds that are in a raw material and cleanup material expressed as pounds of OC per gallon), solids content, or density of a raw material shall be based on the raw materials as employed. The company shall determine the composition of the raw materials by formulation data supplied by the manufacturer of the raw materials, or from data determined by an analysis of each raw material, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of raw materials by Reference Method 24 or an equivalent or alternative method.

F. **Miscellaneous Requirements**

1. None