



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
WASHINGTON COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**Application No: 06-04630**

**DATE:** 7/17/2003

Kraton Polymers  
Erik Sims  
2982 Washington Blvd  
Belpre, OH 457141842

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

*Michael W. Ahern*

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

CC: USEPA

SEDO

WV

PA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

**DRAFT MODIFICATION OF PERMIT TO INSTALL 06-04630**

Application Number: 06-04630  
APS Premise Number: 0684010011  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Kraton Polymers  
Person to Contact: Erik Sims  
Address: 2982 Washington Blvd  
Belpre, OH 457141842

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2982 Washington Blvd  
Belpre, Ohio**

Description of proposed emissions unit(s):

**Administrative modification to PTI 06-04630 issued April 10 1996 for emission units P013 and P015 to correct emission and the corresponding hours of operation limitation.**

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

Kraton Polymers

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PTI Application: 06-04630

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

**1. Monitoring and Related Record keeping 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 record keeping 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 record keeping 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.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, 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**

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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

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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.

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#### **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.

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**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 Record keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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

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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**

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).

**8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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.

**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>
NO <sub>x</sub>	28
CO	6
PM	2

**Kraton Polymers**

**Facility ID: 0684010011**

**PTI Application: 06-04630**

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

None

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

None

**Krato**  
**PTI A**

Emissions Unit ID: **P012**

**Issued: To be entered upon final issuance**

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

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P012 - 280 HP (0.71 MMBtu/hr) Diesel-fuel fired water pump (Modified)	OAC rule 3745-18-06(G) OAC rule 3745-31-05(A)(3) OAC rule 3745-31-05(D)

OAC rule 3745-17-11(B)(5)(a)

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

40 CFR 52.1881(b)(29)(i)

**Krato**  
**PTI A**

Emissions Unit ID: **P012**

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control  
Measures

NO<sub>x</sub> emissions shall not exceed 8.68 lbs/hr

CO emissions shall not exceed 1.87 lbs/hr

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(a) and 3745-17-07(A), and 40 CFR 51.1881(B)(29)(i).

Particulate emissions shall not exceed 0.25 lb/MMBtu actual heat input. See A.I.2.a below.

Particulate emissions shall not exceed 0.310 lb/MMBtu actual heat input. See A.I.2.b below.

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

SO<sub>2</sub> emissions shall not exceed 2.5 pounds per MMBtu of actual heat input from any stack

Exempt pursuant to OAC rule 3745-18-06(B).

NO<sub>x</sub> emissions shall not exceed 14.0 tons per year based upon a rolling, 12-month summation..

CO emissions shall not exceed 3.0 tons per year based upon a rolling, 12-month summation..

## **2. Additional Terms and Conditions**

- 2.a** The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb/MMBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.b** The particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

## **II. Operational Restrictions**

1. The permittee shall burn only #2 fuel oil as fuel in this emissions unit.
2. The operating hours for this emissions unit shall not exceed 3226 hours per 12-month period, based upon a rolling, 12-month summation. The permittee has sufficient records to demonstrate compliance with this restriction during the first twelve months after issuance of this permit.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. The hours of operation for each month; and
  - b. The rolling, 12-month summation of hours of operation.
2. For each day during which the permittee burns a fuel other than #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. On an annual basis, the permittee shall obtain and maintain records of a certification from each oil supplier that indicates whether or not each shipment of fuel oil delivered to the facility during the calendar year met the ASTM specifications for #2 fuel oil. Due to the high allowable sulfur dioxide emission rate for this emissions unit, the permittee is not required to perform additional monitoring or record keeping, besides the annual certifications, to demonstrate compliance with the allowable emission rate for sulfur dioxide.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month operating hours limitation.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than #2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days

after the deviation occurs.

3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with the emissions limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 8.68 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated based upon the emission factor of 0.031 lb/hp-hr of nitrogen oxides. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1, dated October 1996.

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 7.

- b. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 14.0 tons per year based upon a rolling, 12-month summation..

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton Emission Limitation.

- c. Emission Limitation:

CO emissions shall not exceed 1.87 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated based upon the emission factor of 0.00668 lb/hp-hr of carbon monoxide. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1, dated October 1996.

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If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 10.

## d. Emission Limitation:

CO emissions shall not exceed 3.0 tons per year based upon a rolling, 12-month summation.

## Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton Emission Limitation.

## e. Emission Limitation:

Particulate emissions shall not exceed 0.25 lb/MMBtu actual heat input.

## Applicable Compliance Method:

The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96). The Ohio EPA revised the emission limitation specified in the rule citation based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.25 lb/MMBtu actual heat input emission limitation will no longer be applicable, and the permittee will be able to demonstrate compliance with the new emission limitation (0.310 lb/MMBtu actual heat input) using the current emission factor.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

## f. Emission Limitation:

Particulate emissions shall not exceed 0.310 lb/MMBtu actual heat input.

## Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.31 lb/MMBtu. This emission

**Krato****PTI A**Emissions Unit ID: **P012****Issued: To be entered upon final issuance**

factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

## g. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and in OAC rule 3745-17-03(B)(1).

## h. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 2.5 pounds per MMBtu of actual heat input

Applicable Compliance Method:

Compliance shall be based upon the record keeping in A.III.

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6.

**VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - 280 HP (0.71 MMBtu/hr) Diesel-fuel fired water pump (Modified)	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Krato  
PTI A

Emissions Unit ID: P015

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P015 - 280 HP (0.71 MMBtu/hr) Diesel-fuel fired water pump (Modified)	OAC rule 3745-31-05(A)(3) 40 CFR 52.1881(b)(29)(i) OAC rule 3745-18-06(G)
	OAC rule 3745-17-11(B)(5)(a)
	OAC rule 3745-17-07(A)(1)

**Krato****PTI A**Emissions Unit ID: **P015****Issued: To be entered upon final issuance**

<u>Applicable Emissions Limitations/Control Measures</u>	MMBtu of actual heat input from any stack
NO <sub>x</sub> emissions shall not exceed 8.68 lbs/hr	Exempt pursuant to OAC rule 3745- 18-06(B).
NO <sub>x</sub> emissions shall not exceed 14.0 TPY	
CO emissions shall not exceed 1.87 lbs/hr	
CO emissions shall not exceed 3.0 TPY	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(a) and 3745-17-07(A), and 40 CFR 51.1881(B)(29)(i).	
Particulate emissions shall not exceed 0.25 lb/MMBtu actual heat input. See A.I.2.a below.	
Particulate emissions shall not exceed 0.310 lb/MMBtu actual heat input. See A.I.2.b below.	
Visible particulate emissions from any stack shall not exceed 20% opacity as a 6- minute average, except as provided by the rule.	
SO <sub>2</sub> emissions shall not exceed 2.5 pounds per	

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- 2.a** The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb/MMBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.b** The particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

**II. Operational Restrictions**

1. The operating hours for this emissions unit shall not exceed 3226 hours per 12-month period, based upon a rolling, 12-month summation.
2. The permittee shall burn only #2 fuel oil as fuel in this emissions unit.

**III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. The hours of operation for each month; and
  - b. The rolling, 12-month summation of hours of operation.
2. For each day during which the permittee burns a fuel other than #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. On an annual basis, the permittee shall obtain and maintain records of a certification from each oil supplier that indicates whether or not each shipment of fuel oil delivered to the facility during the calendar year met the ASTM specifications for #2 fuel oil. Due to the high allowable sulfur dioxide emission rate for this emissions unit, the permittee is not required to perform additional monitoring or record keeping, besides the annual certifications, to demonstrate compliance with the allowable emission rate for sulfur dioxide.

**IV. Reporting Requirements**

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

the rolling, 12-month operating hours limitation.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than #2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions of this permit.

## **V. Testing Requirements**

1. Compliance with the emissions limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 8.68 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated based upon the emission factor of 0.031 lb/hp-hr of nitrogen oxides. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1, dated October 1996.

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 7.

- b. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 14.0 TPY

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton Emission Limitation.

- c. Emission Limitation:

CO emissions shall not exceed 1.87 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated based upon the emission factor of 0.00668 lb/hp-hr of

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Carbon Monoxide. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1, dated October 1996.

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 10.

## d. Emission Limitation:

CO emissions shall not exceed 3.0 TPY

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton Emission Limitation.

## e. Emission Limitation:

Particulate emissions shall not exceed 0.25 lb/MMBtu actual heat input.

Applicable Compliance Method:

The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96). The Ohio EPA revised the emission limitation specified in the rule citation based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.25 lb/MMBtu actual heat input emission limitation will no longer be applicable, and the permittee will be able to demonstrate compliance with the new emission limitation (0.310 lb/MMBtu actual heat input) using the current emission factor.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

## f. Emission Limitation:

Particulate emissions shall not exceed 0.310 lb/MMBtu actual heat input.

**Applicable Compliance Method:**

Compliance may be based upon an emission factor of 0.31 lb/MMBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g. **Emission Limitation:**

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

**Applicable Compliance Method:**

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and in OAC rule 3745-17-03(B)(1).

h. **Emission Limitation:**

SO<sub>2</sub> emissions shall not exceed 2.5 pounds per MMBtu of actual heat input

**Applicable Compliance Method:**

Compliance shall be based upon the record keeping in A.III.

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6.

**VI. Miscellaneous Requirements**

None

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**PTI A**

Emissions Unit ID: **P015**

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**B. State Only Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P015 - 280 HP (0.71 MMBtu/hr) Diesel-fuel fired water pump (Modified)	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None