



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 14-05234

DATE: 4/8/2003

Cincinnati Specialties LLC
Fred Tudor
501 Murray Rd
Cincinnati, OH 452171014

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,

Michael W. Ahern

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

CC: USEPA

HCDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 4/8/2003
Effective Date: 4/8/2003**

FINAL PERMIT TO INSTALL 14-05234

Application Number: 14-05234
APS Premise Number: 1431390137
Permit Fee: **\$600**
Name of Facility: Cincinnati Specialties LLC
Person to Contact: Fred Tudor
Address: 501 Murray Rd
Cincinnati, OH 452171014

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

**501 Murray Rd
Saint Bernard, Ohio**

Description of proposed emissions unit(s):

AA Manufacturing Process Modification.

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 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.

- 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

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.

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PTI Application: 14-05234
Issued: 4/8/2003

Facility ID: 1431390137

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or 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

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

4. Termination of Permit To Install

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

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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

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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.

9. **Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. **Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	14.61
PM/PM ₁₀	7.12

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Cincinnati Specialties LLC
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Cincinnati

PTI A

Issued: 4/8/2003

Emissions Unit ID: P014

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.

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

P014 - Anthranilic Acid
Manufacturing System -
Reactor

OAC rule 3745-31-05(A)(3)

Anthranilic Acid Manufacturing
System - Spray Dryer

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

		<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)(1)	
OAC rule 3745-17-08(B)		Organic Compounds (OC) Emissions: AA Reactor: Stack OC: 37.41 lbs/day, 12.5 lbs/batch Fugitive OC: 2.34 lbs/day, 0.8 lb/batch Total OC: 7.25 tons per year (TPY) OC
OAC rule 3745-21-07(G)	OAC rule 3745-17-07(B)(1)	PM* Emissions: AA Reactor: Fugitive PM: 1.26 lbs/day, 0.4 lb/batch Total PM: 0.23 TPY PM
OAC rule 3745-21-09(DD)	OAC rule 3745-17-08(B)(3)	NaPMC Reaction: Fugitive PM: 29.25 lbs/day 9.8 lbs/batch Total NaPMC Reaction: 5.34 TPY.
OAC rule 3745-21-09(Y Y)	OAC rule 3745-17-11(B)	See term A.II.5
OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1), 3745-17-08(B), 3745-21-09(DD), and 3745-21-09(Y Y). * Assume all PM is PM ₁₀ .
	OAC rule 3745-21-09(DD)	Visible fugitive particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as specified by rule. See term A.II.7 The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See terms A.II.6 and A.III.5.

as specified by rule.

Any VOC emissions from the reactor process vent streams from this emissions unit shall be vented to an enclosed combustion device that is designed and operated to reduce the VOC emissions by at least 95 percent, by weight.

0.030 grains particulate emissions per dry standard cubic foot of exhaust gases from the spray dryer.

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

OC emissions:
AA Spray Dryer:
Stack OC: 9.84 lbs/day
Fugitive OC: 30.48 lbs/day
Total OC: 7.36 TPY OC

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

PM* Emissions:
AA Spray Dryer:
Stack PM: 0.72 lb/hour,
17.28 lbs/day
Fugitive PM: 20.5 lbs/day
Total PM: 6.89 TPY PM

See terms A.II.6 and A.III.5.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B)(3), and 3745-21-09(DD).

* Assume all PM is PM₁₀.

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Visible fugitive particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation, the use of a thermal oxidizer to control the reactor emissions, and the use of a scrubber to control spray drying emissions.
- 2.b** The lb(s)/batch allowables in term A.I.1 above are based upon maximum values listed in the air permit to install application for this permit. If these maximum values change, then the permittee shall implement term and condition A.IV.6.

II. Operational Restrictions

1. The permittee shall operate the scrubber (AA-05) and thermal oxidizer (AA-01) according to the manufacturers' specifications.
2. The pressure drop across scrubber AA-05 shall be continuously maintained at a value of greater than 5 inches of water or the value established during the most recent performance test which demonstrated compliance at all times while the emissions unit is in operation .
3. The liquor flow rate of scrubber AA-05 shall continuously maintained at a value of not less than 39 gallons per minute or the value established during the most recent performance test which demonstrated compliance at all times while the emissions unit is in operation.
4. The average combustion temperature and residence time within thermal oxidizer AA-01, for any 3-hour block of time when the emissions unit is in operation shall not be less than 1300 degrees Fahrenheit or the value established during the most recent performance test which demonstrated compliance and shall be greater than or equal to 1 second, respectively.
5. The maximum number of batches produced in this emissions unit shall not exceed 3 per day.
6. Prior to employing organic materials which are not exempt from the requirements of OAC rule 3745-21-09(DD), Leaks from Process Units That Produce Organic Chemicals, the permittee shall establish written procedures which will demonstrate compliance with all provisions of OAC rule 3745-21-09(DD).
7. When loading solid materials into the reactors, particulate emissions shall be minimized or eliminated to the extent possible by minimizing the drop height and pour rate into the reactor.
8. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber liquor flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across scrubber AA-05, in inches of water, on a once per shift basis;
and
 - b. The liquor flow rate of scrubber AA-05, in gallons per minute, on a once per shift basis.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within thermal oxidizer AA-01 when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor shall correspond to and record the time of day. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

All 3-hour blocks of time during which the average combustion temperature within thermal oxidizer AA-01, when the emissions unit was in operation, was less than 1300 degrees Fahrenheit or the value established during the most recent performance test which demonstrated compliance.

3. The permittee shall collect and record the following information for each day:

A log of the downtime for the capture (collection) systems, control devices, and monitoring equipment, when the associated emissions unit was in operation.

4. The permittee shall maintain daily records of the number of batches produced and the type of material produced.

5. The permittee shall maintain records that contain a listing of the feed and raw materials and products of the process units along with an analysis demonstrating that these materials and products are in heavy liquid service as defined by OAC rule 3745-21-01(M)(10).
6. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit.
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at the required levels as specified in term A.II.:
 - a. The static pressure drop across scrubber AA-05.
 - b. The liquor flow rate of scrubber AA-05.
2. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within thermal oxidizer AA-01 does not comply with the temperature limitation specified above in term A.II.4.
3. The permittee shall submit deviation (excursion) reports which identify the following information:
 - a. An identification of each day during which the organic compound emissions from emissions unit P014 exceeded the limits identified in term A.I.1, and the actual organic compound emissions for each such day.
 - b. An identification of each day during which the particulate emissions from emissions unit P014 exceeded the limits identified in term A.I.1, and the actual particulate emissions for each such day.
 - c. An identification of each day during which the number of batches of material produced exceeded three and the actual number of batches produced for each such day.
 - d. Any exceedance of the lbs/batch emissions limitations identified in term A.I.1 for the reactor operation.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements as specified in Part 1 - General Terms and Conditions A.1.c.ii.

5. Prior to any changes in the production of anthranilic acid, the permittee shall notify the Hamilton County Department of Environmental Services as to whether the changes will result in the feed, raw materials or products of these process units no longer being classified as Heavy Liquids.
6. Prior to any change in the materials listed in this application, the permittee shall provide documentation to this agency to demonstrate that they will still be able to comply with the emission limitations outlined in this permit. If the emission limitations will be exceeded by the change, the permittee shall submit a new permit to install application.
7. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5) was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the visible particulate emission limitations established in OAC rule 3745-17-07(A)(1) stated in term A.I.1. shall be determined by the methods specified in 40 CFR Part 60 Appendix A, Method 9.
2. Compliance with the fugitive visible particulate emission limitations established in OAC rule 3745-17-07(B)(1) stated in term A.I.1. shall be determined by the methods specified in 40 CFR Part 60 Appendix A, Method 9.
3. Compliance with OAC rule 3745-21-09(DD) shall be demonstrated by the record keeping requirements in term A.III.5.
4. Compliance with OAC rule 3745-21-09(YY) shall be demonstrated by the methods outlined in OAC rule 3745-21-10(C).
5. Compliance with the terms A.II.2. and A.II.3 shall be demonstrated by the record keeping in term A.III.1.
6. Compliance with the terms A.II.4. shall be demonstrated by the record keeping in term A.III.2.
7. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulate matter from the AA scrubber and organic compounds from the thermal oxidizer and scrubber. Testing of the thermal oxidizer shall include a test of the control efficiency when only emissions unit P014 is vented to the oxidizer.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

for particulates, Method 5 of 40 CFR Part 60, Appendix A
for VOC, Method 25 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s).

8. Compliance with the PM/PM₁₀ and OC emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05234 submitted 10/23/01. The lbs/batch numbers are based on the calculations submitted in the above noted PTI application.

VI. Miscellaneous Requirements

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Cincinnati Specialties LLC
PTI Application: 14-05234
Issued

Facility ID: 1431390137

Emissions Unit ID: **P014**

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>
P014 - AA Manufacturing System		

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