

Facility ID: 0125040716 Issuance type: Title V Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. The permittee shall maintain and implement a Preventative Maintenance and Malfunction Abatement Plan (PM&MAP) for each emissions unit and its associated control equipment. This plan shall include the requirements for compliance with OAC rule 3745-15-06. Within thirty (30) days following revisions to the plan, it shall be submitted to the Ohio EPA, Central District Office for review and approval.

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### b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B005 - 2.0 mmBtu/hr natural gas-fired boiler;  
B006 - carbon dryer number 72;  
B007 - jeffrey fluid bed dryer;  
B008 - dryer number 93;  
F001 - truck unloading and storage hopper;  
G001 - gasoline dispensing station;  
P029 - bagging operation with dust collector;  
P030 - truck loading with dust collector;  
P039 - carbon acid wash;  
P040 - B62 SWECO screener;  
P041 - B80 SWECO screener;  
P042 - B67 mill/gyratory sifter;  
P043 - east wall screen;  
P044 - doyle mixer;  
P045 - B54 SWECO Screener;  
P046 - nauta mixer/sifter;  
P047 - B62 packaging system;  
P048 - B80 packaging system;  
P049 - B24 mill/gyratory sifter;  
P050 - blue m oven 1;  
P051 - blue m oven 2;  
P052 - blue m oven 3;  
P053 - wyssmont dryer; and  
P054 - double cone washer.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

- [Go to Part III for Emissions Unit F002](#)
- [Go to Part III for Emissions Unit P028](#)
- [Go to Part III for Emissions Unit P035](#)
- [Go to Part III for Emissions Unit P036](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0125040716 Emissions Unit ID: F002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
spent carbon pile	OAC rule 3745-31-05(A)(3) (PTI # 01-8619)	Particulate emissions (PE) shall not exceed 5.15 tons per year (TPY).  Compliance with this rule also includes compliance with OAC rules 3745-17-07(B)(6) and 3745-17-08(B)(6).
	OAC rule 3745-17-07(B)(6)	no visible PE from any material storage pile except for a period of time not to exceed 13 minutes during any 60-minute observation period
	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.1.2.b through A.1.2)

2. Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:
  - (a) carbon storage pile
  - b. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to tarp the carbon pile after completion of the loading activities. Use of the tarp will constitute best available control measures and will ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
  - c. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
  - d. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to use of a tarp. The tarp will constitute best available control measures and will ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
  - e. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of

this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

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**II. Operational Restrictions**

1. None

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

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:
  - storage pile identification minimum load-in inspection frequency
  - carbon pile daily
2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:
  - storage pile identification minimum load-out inspection frequency
  - carbon pile daily
3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:
  - storage pile identification minimum wind erosion inspection frequency
  - carbon pile daily
4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the tarp is in place or when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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**IV. Reporting Requirements**

1. The permittee shall quarterly submit deviation (excursion) reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an

- inspection which was not performed due to an exemption for use of a best available control measure or for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- 2. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

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V. **Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1.1 shall be determined by the following methods:
  - a. Emission Limitation: no visible PE from any material storage pile except for a period of time not to exceed 13 minutes during any 60-minute observation period.
 

Applicable Compliance Method: Compliance with the visible emission limitation for the storage pile identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.
  - b. Emission Limitation: PE shall not exceed 5.15 TPY.
 

Applicable Compliance Method: The annual emission limitation was developed based upon the facility's mass balance calculations [submitted as part of the PTI application, on June 4, 2002] that established a maximum hourly emission rate of 1.18 lbs of PE/hour. The annual emission limitation was than calculated by multiplying the hourly emission rate by 8,760 hour/year and divided by 2,000 lbs/ton.

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VI. **Miscellaneous Requirements**

- 1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0125040716 Emissions Unit ID: P028 Issuance type: Title V Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
carbon regeneration kiln 20A controlled by a thermal incinerator, wet scrubber and venturi scrubber	OAC rule 3745-31-05(A)(3) (PTI # 01-8619)	Particulate emissions (PE) shall not exceed 0.12 pound per hour and 0.54 ton per year (TPY). Nitrogen oxides (NOx) emissions shall not exceed 1.52 pounds per hour and 6.66 TPY. Carbon monoxide (CO) emissions shall not exceed 0.58 pound per hour and 2.53 TPY. Sulfur dioxide (SO2) emissions shall not exceed 0.54 pound per hour and 2.37 TPY. Volatile organic compound (VOC) emissions shall not exceed 7.53 pounds per hour and 33.0 TPY. Barium emissions shall not exceed 0.001 pound per hour and 0.004 TPY. Zinc emissions shall not exceed 0.0009 pound per hour and 0.004 TPY. Copper emissions shall not exceed 0.0008 pound per hour and 0.004 TPY.

Cadmium emissions shall not exceed 0.002 pound per hour and 0.009 TPY.

Lead emissions shall not exceed 0.0002 pound per hour and 0.0007 TPY.

Arsenic emissions shall not exceed 0.0005 pound per hour and 0.002 TPY.

Hydrochloric acid (HCl) emissions shall not exceed 0.94 pound per hour and 4.12 TPY.

Compliance with this rule also includes compliance with the requirements of OAC rule 3745-17-07(A)(1).

See A.1.2.a and A.1.2.b below.

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

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

OAC rule 3745-17-11(B)(1)

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

**2. Additional Terms and Conditions**

- a. The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 95%, by weight, for VOC emissions.
- b. The wet scrubber and venturi scrubber controlling the PE, SO<sub>2</sub> and HCl emissions from this emissions unit shall collectively operate with a minimum control efficiency of 95%, by weight.

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**II. Operational Restrictions**

- 1. The average water flow rate through the venturi scrubber and the wet scrubber, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 50 gallons per minute.
- 2. The average pressure drop across the venturi scrubber and the wet scrubber, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 15 inches of water.
- 3. The average pH of the venturi scrubber's and the wet scrubber's liquor, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 6.5.
- 4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

- 1. The permittee shall properly operate and maintain equipment to monitor the water flow rate through the venturi scrubber and the wet scrubber 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 average water flow rate through the wet scrubber, in gallons per minute, for all 3-hour blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device and monitoring equipment when the associated emissions unit was in operation.
- 2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the venturi scrubber and the wet scrubber 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 average pressure drop across the venturi scrubber and the wet scrubber, in inches of water, for all 3-hour blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device, monitoring equipment when the associated emissions unit was in operation.
- 3. The permittee shall properly operate and maintain equipment to monitor the pH of the venturi scrubber's and the wet scrubber's liquor 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 average pH of the venturi scrubber's and the wet scrubber's liquor, for all 3-hour blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device and monitoring equipment when the associated emissions unit was in operation.
4. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. 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.

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**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all 3-hour periods of time during which the average water flow rate through the venturi scrubber and the wet scrubber was not maintained at or above the required level;
  - b. all 3-hour periods of time during which the average pressure drop across the venturi scrubber and the wet scrubber was not maintained at or above the required level;
  - c. all 3-hour periods of time during which the average pH of the venturi scrubber's and the wet scrubber's liquor was not maintained at or above the required level; and
  - d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance.
2. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

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**V. Testing Requirements**

1. Compliance with the emission limitations specified in sections A.1.1 and A.1.2 shall be determined in accordance with the following methods:
  - a. Emission Limitations: PE shall not exceed 0.12 pound per hour; NOx emissions shall not exceed 1.52 pounds per hour; CO emissions shall not exceed 0.58 pound per hour; SO2 emissions shall not exceed 0.54 pound per hour.
  - a. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - i. The emission testing shall be conducted approximately 2.5 years after permit issuance.
    - ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for PE, SO2, NOx and CO.
    - iii. The following test method(s) shall be employed to demonstrate compliance with the hourly PE, SO2, NOx and CO emission limitations:  
40 CFR Part 60, Appendix A, Methods 1 through 5, 6C, 7E and 10.  
  
Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
  - a. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).  
  
Personnel from the Ohio EPA, Central Office and Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.  
  
A comprehensive written report on the results of the emission test(s) shall be signed by the person or

persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

b. Emission Limitations: VOC emissions shall not exceed 7.53 pounds per hour; HCl emissions shall not exceed 0.94 pound per hour; barium emissions shall not exceed 0.001 pound per hour; zinc emissions shall not exceed 0.0009 pound per hour; copper emissions shall not exceed 0.0008 pound per hour; cadmium emissions shall not exceed 0.002 pound per hour; arsenic emissions shall not exceed 0.0005 pound per hour; lead emissions shall not exceed 0.0002 pound per hour.

b. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for VOC, HCl, barium, zinc, copper, cadmium, arsenic and lead.

iii. The following test method(s) shall be employed to demonstrate compliance with the hourly VOC, HCl, barium, zinc, copper, cadmium, arsenic and lead emission limitations:

40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate, 26A and 29.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central Office and the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

c. Emission Limitation: The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 95%, by weight, for VOC emissions.

c. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the minimum control efficiency of not less than 95%, by weight, for VOC emissions

iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central Office and Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- d. Emission Limitation: The wet scrubber and venturi scrubber controlling the PE, SO<sub>2</sub> and HCl emissions from this emissions unit shall collectively operate with a minimum control efficiency of 95%, by weight.
- d. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- i. The emission testing shall be conducted approximately 2.5 years after permit issuance.
  - ii. The emission testing shall be conducted to demonstrate compliance with the minimum collective control efficiency requirement for the wet scrubber and venturi scrubber controlling the PE, SO<sub>2</sub> and HCl emissions from this emissions unit as specified in section A.1.
  - iii. The control efficiency (i.e., the percent reduction in particulate, SO<sub>2</sub> and HCL mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5, 6C and 26A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
  - iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central Office and Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- e. Emission Limitations: PE shall not exceed 0.54 TPY; NO<sub>x</sub> emissions shall not exceed 6.66 TPY; CO emissions shall not exceed 2.53 TPY; SO<sub>2</sub> emissions shall not exceed 2.37 TPY; VOC emissions shall not exceed 33.0 TPY; barium emissions shall not exceed, 0.004 TPY; zinc emissions shall not exceed 0.004 TPY; copper emissions shall not exceed 0.004 TPY; cadmium emissions shall not exceed 0.009 TPY; lead emissions shall not exceed 0.0007 TPY; arsenic emissions shall not exceed 0.002 TPY; HCl emissions shall not exceed 4.12 TPY.

Applicable Compliance Method: The annual emission limitations were established by multiplying the hourly emission limitations of each pollutant by 8,760 hrs/year and dividing by 2,000 lbs/ton. Therefore, compliance with the annual emission limitations are ensured if compliance is maintained with the hourly emission limitations.

- f. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125040716 Emissions Unit ID: P028 Issuance type: Title V Proposed Permit

#### B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

#### I. 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>
carbon regeneration kiln 20A controlled by a thermal incinerator, wet scrubber and venturi scrubber		

#### 2. Additional Terms and Conditions

1. None

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#### II. Operational Restrictions

1. None

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#### III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P028) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Benzene

TLV (ug/m3): 1,600  
 Maximum Hourly Emission Rate (lbs/hr): 0.82  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10.46  
 MAGLC (ug/m3): 38

Pollutant: Ethylbenzene

TLV (ug/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 0.72  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9.52  
 MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (ug/m3): 188  
 Maximum Hourly Emission Rate (lbs/hr): 1.03  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.59  
 MAGLC (ug/m3): 4476

Pollutant: Xylene

TLV (ug/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 1.24  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 16.31  
 MAGLC (ug/m3): 10,333  
 Pollutant: Chloroform

TLV (ug/m3): 49  
 Maximum Hourly Emission Rate (lbs/hr): 1.7

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 21.96  
MAGLC (ug/m3): 1,167

Pollutant: HCl

TLV (ug/m3): 7.5 (STEL)  
Maximum Hourly Emission Rate (lbs/hr): 0.94  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 12.55  
MAGLC (ug/m3): 131.61

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used, 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 previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125040716 Emissions Unit ID: P035 Issuance type: Title V Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. 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>
79 carbon regeneration kiln controlled by a thermal incinerator, wet scrubber and venturi scrubber	OAC rule 3745-31-05(A)(3) (PTI # 01-7367)	Particulate emissions (PE) shall not exceed 0.15 pound per hour and 0.66 ton per year (TPY).  Nitrogen oxides (NOx) emissions shall not exceed 0.78 pound per hour and 3.2 TPY.  Carbon monoxide (CO) emissions shall not exceed 0.17 pound per hour and 0.70 TPY.  Sulfur dioxide (SO2) emissions shall not exceed 0.57 pound per hour and 2.34 TPY.  Volatile organic compound (VOC) emissions shall not exceed 19.48 pounds per hour and 85.3 TPY.  Cadmium emissions shall not exceed 0.010 pound per hour and 0.044 TPY.  Mercury emissions shall not exceed 0.011 pound per hour and 0.048 TPY.  Nickel emissions shall not exceed 0.0076 pound per hour and 0.033 TPY.  Phosphorous emissions shall not exceed 0.014 pound per hour and 0.061 TPY. Lead emissions shall not exceed 0.068 pound per hour and 0.30 TPY.  Hydrochloric acid (HCl) emissions shall not exceed 1.125 pound per hour and 4.63 TPY.  Compliance with this rule also includes compliance with the requirements of OAC rule 3745-17-07(A)(1).  See A.1.2.a, A.1.2.b, and A.II.5 below. Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(B)(1)	

**2. Additional Terms and Conditions**

- a. The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 90%, by weight, for VOC emissions.
- b. The wet scrubber and venturi scrubber controlling the PE, SO2 and HCl emissions from this emissions unit shall collectively operate with a minimum control efficiency of 95%, by weight.

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**II. Operational Restrictions**

- 1. The average water flow rate through the venturi scrubber and the wet scrubber, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 60 gallons per minute.
- 2. The average pressure drop across the venturi scrubber and the wet scrubber, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 16.2 inches of water.
- 3. The average pH of the venturi scrubber's and the wet scrubber's liquor, for any 3-hour block of time when the emissions unit is in operation, shall be within the range of 6.0 to 10.0.
- 4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

5. The maximum hourly process rate for this emissions unit shall not exceed 770 pounds of carbon per hour.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the water flow rate through the venturi scrubber and the wet scrubber 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 average water flow rate through the venturi scrubber and the wet scrubber, in gallons per minute, for all 3-hour blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the venturi scrubber and the wet scrubber 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 average pressure drop across the venturi scrubber and the wet scrubber, in inches of water, for all 3-hour blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall properly operate and maintain equipment to monitor the pH of the venturi scrubber's and the wet scrubber's liquor 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 average pH of the venturi scrubber's and the wet scrubber's liquor, for all 3-hour blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device and monitoring equipment when the associated emissions unit was in operation.
4. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. 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.
5. The permittee shall maintain the following daily records:
  - a. the amount of carbon produced in this emissions unit, in pounds;
  - b. the number of hours of operation; and
  - c. the average hourly process rate, in pounds (a/b).

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### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all 3-hour periods of time during which the average water flow rate through the venturi scrubber and the wet scrubber was not maintained at or above the required level;
  - b. all 3-hour periods of time during which the average pressure drop across the venturi scrubber and the wet scrubber was not maintained at or above the required level;
  - c. all 3-hour periods of time during which the average pH of the venturi scrubber's and the wet scrubber's liquor was not maintained at or above the required level;
  - d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance; and
  - e. all exceedances of the hourly carbon process rate restriction.
2. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms

and Conditions of this permit.

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V. **Testing Requirements**

1. Compliance with the emission limitations and process rate restriction specified in sections A.I.1, A.I.2, and A.II.5 shall be determined in accordance with the following methods:
  - a. Emission Limitations: PE shall not exceed 0.15 pound per hour; NOx emissions shall not exceed 0.78 pound per hour; CO emissions shall not exceed 0.17 pound per hour; SO2 emissions shall not exceed 0.57 pound per hour.
  - a. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - i. The emission testing shall be conducted approximately 2.5 years after permit issuance.
    - ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for PE, SO2, NOx and CO.
    - iii. The following test method(s) shall be employed to demonstrate compliance with the hourly PE, SO2, NOx and CO emission limitations:  
40 CFR Part 60, Appendix A, Methods 1 through 5, 6C, 7E and 10.  
  
Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
  - a. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).  
  
Personnel from the Ohio EPA, Central Office and Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.  
  
A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.
  - b. Emission Limitations: VOC emissions shall not exceed 19.48 pounds per hour; HCl emissions shall not exceed 1.125 pound per hour; nickel emissions shall not exceed 0.0076 pound per hour; phosphorous emissions shall not exceed 0.014 pound per hour; cadmium emissions shall not exceed 0.01 pound per hour; mercury emissions shall not exceed 0.011 pound per hour; lead emissions shall not exceed 0.068 pound per hour.
  - b. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.
    - ii. The emission testing shall be conducted to demonstrate compliance with the hourly mass emission limitations for VOC, HCl, nickel, phosphorous, cadmium, mercury and lead.
    - iii. The following test method(s) shall be employed to demonstrate compliance with the hourly VOC, HCl, nickel, phosphorous, cadmium, mercury and lead emission rates:  
40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate, 26A and 29.  
  
Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
  - b. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District

Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central Office and Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- c. Emission Limitation: The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 90%, by weight, for VOC emissions.
- c. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.
  - ii. The emission testing shall be conducted to demonstrate compliance with the minimum control efficiency of 90%, by weight, for VOC emissions.
  - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
- c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central Office and the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- d. Emission Limitation: The wet scrubber and venturi scrubber controlling PE, SO<sub>2</sub> and HCl emissions from this emissions unit shall collectively operate with a minimum control efficiency of 95%, by weight.
- d. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - i. The emission testing shall be conducted approximately 2.5 years after permit issuance.
  - ii. The emission testing shall be conducted to demonstrate compliance with the minimum collection control efficiency requirement of 95%, by weight, for the wet scrubber and venturi scrubber controlling the PE, SO<sub>2</sub> and HCl emissions from this emissions unit.
  - iii. The control efficiency (i.e., the percent reduction in PE, SO<sub>2</sub> and HCl emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5, 6C and 26A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
  - iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Central Office and Ohio EPA, Central District Office shall be permitted to

witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- e. Emission Limitations: PE shall not exceed 0.66 TPY; NOx emissions shall not exceed 3.2 TPY; CO emissions shall not exceed 0.7 TPY; SO2 emissions shall not exceed 2.34 TPY; VOC emissions shall not exceed 85.3 TPY; phosphorous emissions shall not exceed 0.061 TPY; cadmium emissions shall not exceed 0.044 TPY; lead emissions shall not exceed 0.3 TPY; mercury emissions shall not exceed 0.048 TPY; HCl emissions shall not exceed 4.63 TPY.

Applicable Compliance Method: The annual emission limitations were established by multiplying the hourly emission limitations of each pollutant by 8,760 hrs/year and dividing by 2,000 lbs/ton. Therefore, compliance with the annual emission limitations are ensured if compliance is maintained with the hourly emission limitations.

- f. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. Miscellaneous Requirements

- 1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
79 carbon regeneration kiln controlled by a thermal incinerator, wet scrubber and venturi scrubber		

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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

1. The permit to install for this emissions unit (P035) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (ug/m3): 1,188,000  
Maximum Hourly Emission Rate (lbs/hr): 3.53  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 34.07  
MAGLC (ug/m3): 28,285

Pollutant: Benzene

TLV (ug/m3): 1,600  
Maximum Hourly Emission Rate (lbs/hr): 1.49  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 14.4  
MAGLC (ug/m3): 38

Pollutant: Chloroform

TLV (ug/m3): 49,000  
Maximum Hourly Emission Rate (lbs/hr): 0.81  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 7.81  
MAGLC (ug/m3): 1,167

Pollutant: Cumene

TLV (ug/m3): 246,000  
Maximum Hourly Emission Rate (lbs/hr): 0.28  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 2.7  
MAGLC (ug/m3): 5,957

Pollutant: 1,2-Dichloroethylene

TLV (ug/m3): 793,000  
Maximum Hourly Emission Rate (lbs/hr): 0.366  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 3.53  
MAGLC (ug/m3): 18,881  
Pollutant: Ethyl Acetate

TLV (ug/m3): 1,440  
Maximum Hourly Emission Rate (lbs/hr): 0.367  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 3.54  
MAGLC (ug/m3): 34,285

Pollutant: Ethylbenzene

TLV (ug/m3): 434  
Maximum Hourly Emission Rate (lbs/hr): 0.925  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 8.92  
MAGLC (ug/m3): 10,333

Pollutant: Methanol

TLV (ug/m3): 262  
Maximum Hourly Emission Rate (lbs/hr): 1.36  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 13.14  
MAGLC (ug/m3): 6,238

Pollutant: Methylene Chloride

TLV (ug/m3): 174,000  
Maximum Hourly Emission Rate (lbs/hr): 0.576  
Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 5.55  
MAGLC (ug/m3): 4,143

Pollutant: n-Propyl Acetate

TLV (ug/m3): 835,000

Maximum Hourly Emission Rate (lbs/hr): 0.34  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 3.28  
 MAGLC (ug/m3): 19,952

Pollutant: Toluene

TLV (ug/m3): 188  
 Maximum Hourly Emission Rate (lbs/hr): 2.768  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 26.69  
 MAGLC (ug/m3): 4,476  
 Pollutant: Trichloroethylene

TLV (ug/m3): 269,000  
 Maximum Hourly Emission Rate (lbs/hr): 3.24  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 31.25  
 MAGLC (ug/m3): 6,405

Pollutant: Xylene

TLV (ug/m3): 434,000  
 Maximum Hourly Emission Rate (lbs/hr): 1.04  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 10  
 MAGLC (ug/m3): 10,333  
 Pollutant: HCl

TLV (ug/m3): 7.5 (STEL)  
 Maximum Hourly Emission Rate (lbs/hr): 1.13  
 Predicted 1-Hour Maximum Ground-Level  
 Concentration (ug/m3): 10.85  
 MAGLC (ug/m3): 131.61

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, 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 previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).  
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0125040716 Emissions Unit ID: P036 Issuance type: Title V Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
carbon regeneration kiln 20B controlled by a thermal incinerator, wet scrubber and venturi scrubber	OAC rule 3745-31-05(A)(3) (PTI # 01-8619)	Particulate emissions (PE) shall not exceed 0.12 pound per hour and 0.54 ton per year (TPY).  Nitrogen oxides (NOx) emissions shall not exceed 1.52 pounds per hour and 6.66 TPY.  Carbon monoxide (CO) emissions shall not exceed 0.58 pound per hour and 2.53 TPY.  Sulfur dioxide (SO2) emissions shall not exceed 0.54 pound per hour and 2.37 TPY.  Volatile organic compound (VOC) emissions shall not exceed 7.53 pounds per hour and 33.0 TPY.  Barium emissions shall not exceed 0.001 pound per hour and 0.004 TPY.  Zinc emissions shall not exceed 0.0009 pound per hour and 0.004 TPY.  Copper emissions shall not exceed 0.0008 pound per hour and 0.004 TPY.  Cadmium emissions shall not exceed 0.002 pound per hour and 0.009 TPY.  Lead emissions shall not exceed 0.0002 pound per hour and 0.0007 TPY.  Arsenic emissions shall not exceed 0.0005 pound per hour and 0.002 TPY.  Hydrochloric acid (HCl) emissions shall not exceed 0.94 pound per hour and 4.12 TPY.  Compliance with this rule also includes compliance with the requirements of OAC rule 3745-17-07(A)(1).  See A.1.2.a and A.1.2.b below.  Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.  The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(B)(1)	

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

**2. Additional Terms and Conditions**

- a. The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 95%, by weight, for VOC emissions.
- b. The wet scrubber and venturi scrubber controlling the PE, SO<sub>2</sub> and HCl emissions from this emissions unit shall collectively operate with a minimum control efficiency of 95%, by weight.

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1. The average water flow rate through the venturi scrubber and the wet scrubber, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 50 gallons per minute.
2. The average pressure drop across the venturi scrubber and the wet scrubber, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 15 inches of water.
3. The average pH of the venturi scrubber's and the wet scrubber's liquor, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 6.5.
4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.

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1. The permittee shall properly operate and maintain equipment to monitor the water flow rate through the venturi scrubber and the wet scrubber 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 average water flow rate through the wet scrubber, in gallons per minute, for all 3-hour blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the venturi scrubber and the wet scrubber 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 average pressure drop across the venturi scrubber and the wet scrubber, in inches of water, for all 3-blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device and monitoring equipment when the associated emissions unit was in operation.
3. The permittee shall properly operate and maintain equipment to monitor the pH of the venturi scrubber's and the wet scrubber's liquor 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 average pH of the venturi scrubber's and the wet scrubber's liquor, for all 3-hour blocks of time that the emissions unit was operated; and
  - b. the downtime for the control device and monitoring equipment when the associated emissions unit was in operation.
4. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. 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.

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1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. all 3-hour periods of time during which the average water flow rate through the venturi scrubber and the wet scrubber was not maintained at or above the required level;
- b. all 3-hour periods of time during which the average pressure drop across the venturi scrubber and the wet scrubber was not maintained at or above the required level;
- c. all 3-hour periods of time during which the average pH of the venturi scrubber's and the wet scrubber's liquor was not maintained at or above the required level; and
- d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

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V. **Testing Requirements**

1. Compliance with the emission limitations specified in section A.1.1 shall be determined in accordance with the following methods:
  - a. Emission Limitations: PE shall not exceed 0.12 pound per hour; NOx emissions shall not exceed 1.52 pounds per hour; CO emissions shall not exceed 0.58 pound per hour; SO2 emissions shall not exceed 0.54 pound per hour.
  - a. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - i. The emission testing shall be conducted approximately 2.5 years after permit issuance.
    - ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for PE, SO2, NOx and CO.
    - iii. The following test method(s) shall be employed to demonstrate compliance with the hourly PE, SO2, NOx and CO emission limitations:  
40 CFR Part 60, Appendix A, Methods 1 through 5, 6C, 7E and 10.  
Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.
  - a. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).  
  
Personnel from the Ohio EPA Central Office and the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.  
  
A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.
  - b. Emission Limitation: VOC emissions shall not exceed 7.53 pounds per hour; HCl emissions shall not exceed 0.94 pound per hour; barium emissions shall not exceed 0.001 pound per hour; zinc emissions shall not exceed 0.0009 pound per hour; copper emissions shall not exceed 0.0008 pound per hour; cadmium emissions shall not exceed 0.002 pound per hour; arsenic emissions shall not exceed 0.0005 pound per hour; lead emissions shall not exceed 0.0002 pound per hour.
  - b. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.
    - ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for VOC, HCl, barium, zinc, copper, cadmium, arsenic and lead.

- iii. The following test method(s) shall be employed to demonstrate compliance with the hourly VOC, HCl, barium, zinc, copper, cadmium, arsenic and lead emission limitations:

40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate, 26A and 29.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central Office and Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- c. Emission Limitation: The thermal incinerator controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 95%, by weight, for VOC emissions.

- c. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the minimum control efficiency requirement of 95%, by weight, for VOC emissions.

iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA Central Office and the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- d. Emission Limitation: The wet scrubber and venturi scrubber controlling the PE, SO<sub>2</sub> and HCl emissions from this emissions unit shall collectively operate with a minimum control efficiency of 95%, by weight.

- d. Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted approximately 2.5 years after permit issuance.

ii. The emission testing shall be conducted to demonstrate compliance with the minimum collective control efficiency requirement for the wet scrubber and venturi scrubber of 95%, by weight, for controlling the PE, SO<sub>2</sub> and HCl emissions from this emissions unit.

iii. The control efficiency (i.e., the percent reduction in PE, SO<sub>2</sub> and HCl mass emissions between the

inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5, 6C and 26A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA Central Office and Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

e. Emission Limitations: PE shall not exceed 0.54 TPY; NOx emissions shall not exceed 6.66 TPY; CO emissions shall not exceed 2.53 TPY; SO2 emissions shall not exceed 2.37 TPY; VOC emissions shall not exceed 33.0 TPY; barium emissions shall not exceed, 0.004 TPY; zinc emissions shall not exceed 0.004 TPY; copper emissions shall not exceed 0.004 TPY; cadmium emissions shall not exceed 0.009 TPY; lead emissions shall not exceed 0.0007 TPY; arsenic emissions shall not exceed 0.002 TPY; HCl emissions shall not exceed 4.12 TPY.

Applicable Compliance Method: The annual emission limitations were established by multiplying the hourly emission limitations of each pollutant by 8,760 hrs/year and dividing by 2,000 lbs/ton. Therefore, compliance with the annual emission limitations are ensured if compliance is maintained with the hourly emission limitations.

f. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0125040716 Emissions Unit ID: P036 Issuance type: Title V Proposed Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
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carbon regeneration kiln 20B controlled by a thermal incinerator, wet scrubber and venturi scrubber

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P036) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Benzene

TLV (ug/m3): 1,600  
Maximum Hourly Emission Rate (lbs/hr): 0.82  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10.46  
MAGLC (ug/m3): 38

Pollutant: Ethylbenzene

TLV (ug/m3): 434  
Maximum Hourly Emission Rate (lbs/hr): 0.72  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9.52  
MAGLC (ug/m3): 10,333

Pollutant: Toluene

TLV (ug/m3): 188  
Maximum Hourly Emission Rate (lbs/hr): 1.03  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.59  
MAGLC (ug/m3): 4,476

Pollutant: Xylene

TLV (ug/m3): 434  
Maximum Hourly Emission Rate (lbs/hr): 1.24  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 16.31  
MAGLC (ug/m3): 10,333  
Pollutant: Chloroform

TLV (ug/m3): 49  
Maximum Hourly Emission Rate (lbs/hr): 1.7  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21.96  
MAGLC (ug/m3): 1,167

Pollutant: HCl

TLV (ug/m3): 7.5 (STEL)  
Maximum Hourly Emission Rate (lbs/hr): 0.94  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.55  
MAGLC (ug/m3): 131.61

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, 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 previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0125040716 Issuance type: Title V Proposed Permit

**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0125040716 Emissions Unit ID: P038 Issuance type: Title V Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
B33- Mill/Gyratory Sifter, equipped with a baghouse	OAC rule 3745-31-05(A)(3) (PTI # 01-8619)	Particulate emissions (PE) shall not exceed 1.25 pounds per hour and 5.48 tons per year (TPY).  Compliance with this rule also includes compliance with the requirements of OAC rule 3745-17-07(A)(1).

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

See A.1.2.a below.

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

OAC rule 3745-17-11(B)(1)

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

**2. Additional Terms and Conditions**

- a. PE from the baghouse controlling PE from this emissions unit shall not exceed 0.02 grain per dry standard cubic foot (dscf).

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**II. Operational Restrictions**

1. The pressure drop across the baghouse controlling emissions from this emissions unit shall be maintained within the range of 0.6 to 1.4 inches of water while this emissions unit is in operation.

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

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
  - whether the emissions are representative of normal operations;
  - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible PE. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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**V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I shall be determined in accordance with the following methods:
- Emission Limitations: PE shall not exceed 1.25 pounds per hour and 0.02 grain/dscf:  
 Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - The emission testing shall be conducted approximately 2.5 years after permit issuance.
    - The emission testing shall be conducted to demonstrate compliance with the hourly emission limitation

and the grain/dscf emission limitation for PE.

iii. The following test method(s) shall be employed to demonstrate compliance with the hourly emission and the grain/dscf limitations for PE:

40 CFR Part 60, Appendix A, Methods 1 through 5.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

iv. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

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

Personnel from the Ohio EPA, Central Office and Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

b. Emission Limitation: PE shall not exceed 5.48 TPY.

Applicable Compliance Method: The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hrs/year and dividing by 2,000 lbs/ton. Therefore, compliance with the annual emission limitation is ensured if compliance is maintained with the hourly emission limitation.

c. Emission Limitation: Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125040716 Emissions Unit ID: P038 Issuance type: Title V Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
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**2. Additional Terms and Conditions**

1. None

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**II. Operational Restrictions**

1. None

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

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None