



State of Ohio Environmental Protection Agency

Street Address:

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

Lazarus Gov. Center

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

CERTIFIED MAIL

Application No: 04-00962

DATE: 4/9/2002

BEC Laboratories, Inc.
Doug Hyer
705 Front St.
Toledo, OH 43605

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

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

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

Very truly yours,

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

CC: USEPA TDES Toledo Met Area Coun of Gov IN MI



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 04-00962

Application Number: 04-00962
APS Premise Number: 0448011623
Permit Fee: **To be entered upon final issuance**
Name of Facility: BEC Laboratories, Inc.
Person to Contact: Doug Hyer
Address: 705 Front St.
Toledo, OH 43605

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

**615 Front St.
Toledo, Ohio**

Description of proposed emissions unit(s):

Ethylene oxide sterilization chamber with an acid-water scrubber for control.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

BEC Laboratories, Inc.

PTI Application: 04-00962

Issued: To be entered upon final issuance

lead to such sanctions

Facility ID: 0448011623

BEC Laboratories, Inc.
PTI Application: 04-00962

Facility ID: 0448011623

Issued: To be entered upon final issuance

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

BEC Laboratories, Inc.
PTI Application: 04-00962

Facility ID: 0448011623

Issued: To be entered upon final issuance

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit..

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Ethylene Oxide	0.48

BEC Laboratories, Inc.
PTI Application: 04-00962
Issued: To be entered upon final issuance

Facility ID: 0448011623

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **Biological & Environmental Control Laboratories, Inc.** located in **Lucas** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
P003	Ethylene Oxide Sterilizer #2	Scrubber for Control of Ethylene Oxide	3745-31-05 NESHAP for Ethylene Oxide Commercial Sterilization and Fumigation Operations	0.11 lbs/hr of Ethylene Oxide 99% Reduction of ethylene oxide emissions from the sterilization chamber vent

BEC Laboratories, Inc.

PTI Application: 04-00962

Issued: To be entered upon final issuance

Facility ID: 0448011623

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Standard Requirements Terms

1. This facility shall reduce ethylene oxide emissions to the atmosphere by at least 99 percent from each sterilization chamber vent.
2. When usage exceeds 10 tons per year, this facility shall limit ethylene oxide emissions to the atmosphere from each chamber exhaust vent by either manifolding the emissions to a control device, or reducing ethylene oxide emissions by at least 99 percent (without manifolding).

Dates of Compliance Term

3. This facility shall comply with all the applicable provisions of subpart O no later than 12/6/97.

Performance Test Requirements

4. This facility shall conduct an initial performance test using the procedures and methods listed in 63.7 of subpart A, and section 63.363 of subpart O as well as the test methods listed in section 63.365 of subpart O. The testing shall be completed within 180 days after the compliance date.

Compliance & Performance Test Requirements

5. During the performance test, this facility shall determine the efficiency of control devices, used to comply with the emission limits, using the test methods and procedures in section 63.365(b)(1) of subpart O.

Also, this facility shall determine/establish, as a site-specific operating parameter, the maximum ethylene glycol concentration using the procedures described in section 63.365 (e)(1) of subpart O.

Following the date on which the initial performance test is completed, this facility shall be in violation of the sterilization chamber vent standard if it is operating with an ethylene glycol concentration in the scrubber liquor in excess of the maximum ethylene glycol concentration.

Monitoring Requirements

6. This facility shall comply with the applicable monitoring requirements in section 63.8 of subpart A.
7. This facility shall monitor all applicable parameters and all monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the source are obtained.

For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system.

8. This facility shall sample the scrubber liquor and analyze and record once per week (only during weeks the sterilizer was used) the ethylene glycol concentration of the scrubber liquor using the test methods and procedures in 63.365(e)(1);

Recordkeeping Requirements

9. This facility shall fulfill all applicable recordkeeping requirements of 63.10(b) and (c) of subpart A.

Reporting Requirements

10. This facility shall fulfill all reporting requirements in 63.10(a), (d), (e), and (f) of subpart A. These reports shall be sent to the Administrator on or before the specified date.
11. These reports shall be delivered or postmarked, to the Administrator, within 30 days following the end of each calendar half or quarter, as applicable according to 63.10(e)(3)(i) through (iv). Written reports of excess emissions or exceedances of process or control system parameters shall include the information from any calibration test in which the monitoring equipment is not in compliance with PS-9 or the method used for temperature calibration along with the following information:
- A. The date and time of each period during which the continuous monitoring system was inoperative, except for low and high level checks, and the nature of the repairs or adjustments performed.
 - B. The date and time of each period during which the continuous monitoring system was out of control, as defined in 63.8(c)(7), and the nature of the repairs or adjustments performed.
 - C. The date and time of commencement and completion of each period of excess emissions and parameter monitoring exceedances that occur including during startups, shutdowns, and malfunctions of the affected source.
 - D. The nature and cause of any malfunction, if known, and the corrective action taken or preventive measures adopted.
 - E. The total process operating time during the reporting period and all the procedures that are part of a quality control program that is developed and implemented for the continuous monitoring systems required by 63.8(d) subpart A.

These written reports shall also include the name, title, and signature of the responsible official who is certifying the accuracy of the report. When no excess emissions, or exceedances have occurred, or monitoring equipment has not been inoperative, repaired, or adjusted, such information shall be stated in the report.

12. This facility shall comply with all applicable notification requirements of 63.9 of subpart A as well as Initial Notification requirements of 63.366 (c) of subpart O.

BEC Laboratories, Inc.

Facility ID: 0448011623

PTI Application: 04-00962

Issued: To be entered upon final issuance

13. This facility shall notify the Administrator, in writing, of the intended construction or reconstruction. The notification shall be submitted as soon as practicable before such event is planned to commence. If the construction or reconstruction had commenced and the initial startup date has not occurred before 12/6/94, then the notification shall be submitted as soon as practicable before the initial startup date.

The notification shall include all the information required for an application for approval of construction or reconstruction as specified in 63.366(b)(3) of subpart O and 63.5(d)(3) and (4) of subpart A.

14. This facility shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status.
15. This facility shall submit an estimated amount of ethylene oxide that is expected to be used during the first consecutive 12-month period of operation, in the initial notification report.