OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL
MONTGOMERY COUNTY
Application No: 08-04187

DATE: 7/20/00

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Eurand America Inc
Linda Jackowiak
845 Center Dr
Vandalia, OH 45377-0000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 may be issued in proposed of 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 a fee of **$200** 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

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

CC: USEPA **RAPCA** **KY**
IN **Miami Valley Reg Plan Com**

DRAFT PERMIT TO INSTALL 08-04187

Application Number:	08-04187
APS Premise Number:	0857171794
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Eurand America Inc
Person to Contact:	Linda Jackowiak
Address:	845 Center Dr Vandalia, OH 45377-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:
845 Center Dr
Vandalia, **Ohio**

Description of proposed emissions unit(s):
replacement of dryer for the 1,000 gal encapsulation system; chapter 31 replacing 08-1173 issued 3-4-87.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. 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 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 lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate 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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(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

Pollutant	Tons Per Year
OC	**27.37**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - 200 gallon encapsulation, 500 gallon encapsulation, 1000 gallon encapsulation, and dryer controlled by a catalytic oxidizer, 10,000 gallon storage tank, and solvent recovery system		Compliance with Air Toxic Policy
	OAC rule 3745-31-05(D)	150 lbs/day organic compounds (OC), including fugitive emissions. See Section A.2.a for emission control measures.
	OAC rule 3745-31-05(A)(3)	6.25 lbs/hr, 27.37 TPY OC, including fugitive emissions. See Section A.2.a for emission control measures.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D) and OAC rule 3745-31-05(A).

2. Additional Terms and Conditions

2.a The OC emissions from this emissions unit, shall be controlled through the application of a catalytic oxidizer system, operating at a minimum of 96% overall OC removal/destruction efficiency.

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B. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, 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. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The average supply temperature of the chilled water loop shall not exceed 46 degrees F.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitor and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the oxidizer's catalyst bed 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(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, with any modifications deemed necessary by the permittee.

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

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

   b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

   c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

2. The permittee shall operate and maintain a continuous temperature monitor which measures and records the temperature of the condensate return water when the emissions unit is in operation. The temperature monitor shall be connected to an alarm system that will sound and be relayed and notify the control room personnel if the temperature of the condensate water exceeds 46 degrees F. The temperature monitor and alarm system 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:

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a. The permittee shall record all instances when the operator is notified by the alarm system of a temperature deviation as identified in this permit.

b. The permittee shall maintain a log of condensate temperatures which are observed and recorded each 8 hour shift.

3. The permittee shall collect and record the following information each day when the emissions unit is in operation:

a. the number of batches each day;

b. the number of gallons of each organic compound solvent material in each batch;

c. the density of the organic compound solvent material employed in each batch, (pounds/gallon);

d. the pounds of organic compound solvent material employed in each batch, i.e., (b) X (c);

e. the pounds of organic solvent returned to the process or solvent recovery;

f. the before-control organic compound emission rate for all organic compound solvent materials employed, in pounds/day, i.e.,(a X d)- e;

g. the OC, in pounds, captured by the catalytic oxidizer by multiplying (f) by the capture efficiency determined by the most recent test conducted in accordance with Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or by an alternative method or procedure approved by the Ohio EPA;

h. the fugitive OC emissions by multiplying (f) by 1 minus the capture efficiency determined by the most recent test conducted in accordance with Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M or by an alternative method or procedure approved by the Ohio EPA;

i. the controlled OC emission rate for all of the organic compound solvent materials, each day, by multiplying the amount (g) by a factor of 1 minus the destruction efficiency from the most recent performance test that demonstrated compliance;

j. the emission rate, in pounds per day, i.e., (h + i);

k. the total number of hours per day the unit was in operation;

l. the average hourly controlled organic compound emission rate, i.e., (j/k), in pounds per hour (average).

4. The permit to install for this emissions unit (P001) was evaluated based on the actual materials specified by the permittee in the permit to install application. The emission limitation(s) specified

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in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Cyclohexane

TLV (ug/m3): 1,036,310

Maximum Hourly Emission Rate (lbs/hr): 6.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 229.0

MAGLC (ug/m3): 96,100

Physical changes to or changes in the method of operation of the emissions unit that 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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, the 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 be 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.

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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. where 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.

D. Reporting Requirements

1. In accordance with paragraph A.2. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) which include the following information for this emissions unit:

a. an identification of each day during which the average hourly controlled organic compound emissions rate exceeded 6.25 lbs/hr, and the actual average hourly controlled organic compound emissions for each such day.

b. an identification of each day during which the controlled organic compound emissions rate exceeded 150.0 lbs/day, and the actual controlled organic compound emissions rate for each such day.

c. an identification of all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than fifty degrees Fahrenheit below the average combustion temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

d. an identification of all three hour blocks of time (when the emission unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

e. The permittee shall submit temperature deviation (excursion) reports that identify all instances when the operator is notified by the alarm system of a temperature deviation as identified in this permit.

f. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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g. the permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

6.25 lbs/hr OC, including fugitive emissions

Applicable Compliance Method

Compliance shall be determined by performance testing and recordkeeping as specified in C.3.

b. Emission Limitation

150 lbs/day OC, including fugitive emissions

Applicable Compliance Method

Compliance shall be determined by performance testing and recordkeeping as specified in C.3.

c. Emission Limitation

27.37 TPY OC, including fugitive emissions

Applicable Compliance Method

Compliance shall be determined by the recordkeeping in C.3. and shall be the summation of the daily controlled organic emissions for the calendar year and divided by 2000 lbs/ton.

2. Emission Testing Requirements

The permittee shall conduct, or have conducted, emission testing on this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted within ninety days after permit issuance.

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b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates and overall capture efficiency of 98% and a control efficiency of 98% for organic compounds.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 18 of 40 CFR Part 60, Appendix A, as well as Method 25 or 25 A of 40 CFR Part 60, Appendix A, as appropriate, and the test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for organic compounds. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," stated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative if such approval does not contravene any other applicable requirement.) 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 OAC rule 3745-21-10 of the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95")

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or Local Air Agency's refusal to accept the results of the emission tests.

Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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VI. Miscellaneous Requirements

None.

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NEW SOURCE REVIEW FORM B

PTI Number: 08-04187 Facility ID: 0857171794

FACILITY NAME Eurand America Inc

FACILITY DESCRIPTION replacement of dryer for the 1,000 gal encapsulation system; chapter 31 replacing 08-1173 issued 3-4-87. CITY/TWP Vandalia

SIC CODE 2834 SCC CODE 30106011 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION 200 gallon encapsulation, 500 gallon encapsulation, 1000 gallon encapsulation, 10,000 gallon storage tank, and solvent recovery system

DATE INSTALLED Waiting for PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	lbs/hr	6.25	27.37	6.25	27.37
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: cyclohexane

NEW SOURCE REVIEW FORM B

PTI Number: 08-04187 Facility ID: 0857171794

FACILITY NAME Eurand America Inc

FACILITY DESCRIPTION	replacement of dryer for the 1,000 gal encapsulation system; chapter 31 replacing 08-1173 issued 3-4-87.	CITY/TWP	Vandalia

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☒	0000000**c**.wpd	☐	
Modeling form/results	☐	0000000**s**.wpd	☒	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☐
BAT Study	☐	0000000**b.**wpd	☐	☐
Other/misc.	☐	0000000**t**.wpd	☐	☐

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Eurand is requesting a PTI modification to PTI # 08-1173. A fire destroyed the dryer for the 200, 500, and 1000 gallon encapsulation units. Eurand is choosing to replace the dryer with a larger model. The larger dryer will allow higher production. Since the uncontrolled emissions are calculated as 690.73 TPY OC, Eurand must control the emissions to avoid PSD and Title V thresholds. The permit will be written in draft and the terms and conditions will be federally enforceable.

Cyclohexane is the organic solvent which is used in this process. Cyclohexane is not a HAP. However, cyclohexane has a threshold limit value. Modeling was conducted and the emissions from the encapsulation units are in compliance with the air toxics policy.

Eurand is not able to provide total enclosure for these encapsulation units. The units are located in different rooms and connected by duct work to the dryer and oxidizer. Eurand must determine fugitive emissions but an enclosed system is not possible. The permit requires Eurand to conduct Method 204 or 204A to determine fugitive OC emissions. Or, Eurand may propose an alternative method to determine fugitive emissions. Eurand must stack test at the oxidizer to determine emissions. Compliance will be determined by summing the fugitive emissions and emissions from the stack test.

The condensers are inherent parts of the encapsulation units. The condenser system is a closed loop system. To assure 95% of the cyclohexane is recycled, material balance must be conducted and condenser temperature must be monitored. The boiling point of cyclohexane is 81 degrees C. Eurand plans to maintain the temperature at 5 degrees C (41 degrees F). The permit allows +5 degrees of 46 degrees F.

NEW SOURCE REVIEW FORM B

PTI Number: 08-04187 Facility ID: 0857171794

FACILITY NAME Eurand America Inc

FACILITY DESCRIPTION	replacement of dryer for the 1,000 gal encapsulation system; chapter 31 replacing 08-1173 issued 3-4-87.	CITY/TWP	Vandalia

Total OC emissions = 13.54 + 13.83 TPY = 27.37 TPY OC
Previous PTI #08-1173, allowed OC emissions of 62.0 TPY. Although this modification allows a higher production rate, emissions will be less because the emissions will now be controlled. The allowable emissions will be decreased by: 62.0 TPY - 27.37 TPY = 34.63 TPY OC. A PTI will be recommended for this emissions unit. Recordkeeping, stack testing, and fugitive emissions testing will be required to assure compliance with the terms and conditions of this permit.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install ENTER PTI NUMBER HERE

A. Source Description

This PTI is a modification of an existing PTI, 08-1173. The dryer for the 200, 500, and 10,000 gallon encapsulation units has been replaced with a larger dryer. The dryer is larger which allows more batches to be processed, thus increasing emissions.

B. Facility Emissions and Attainment Status

Eurand is located in Montgomery County which is currently attainment for OC. With the installation of this emissions unit, the total OC emissions from this facility will be 71.73 TPY.

C. Source Emissions

The potential emissions from this emissions unit are equal to 690.73 TPY OC. This permit will be written in draft and will have a federally enforceable limitation of 27.37 TPY OC. The encapsulation units are equipped with condensers and have been determined as inherent parts of the process. The efficiency of the condensers will be determined by material balance and record keeping. The dryer is vented to a catalytic oxidizer. The uncontrolled emissions from the catalytic oxidizer will be determined by stack testing. A total enclosure system, to determine fugitive emissions which may occur prior to the oxidizer, is not possible because the encapsulation units are located in different rooms. The fugitive emissions will be determined by Method 204 or 204F, or by an approved alternative method.

D. Conclusion

A PTI will be recommended for this emissions unit. Recordkeeping, stack testing, and fugitive emissions testing will be required to assure compliance with the terms and conditions of this permit.

NEW SOURCE REVIEW FORM B

PTI Number: 08-04187 Facility ID: 0857171794

FACILITY NAME Eurand America Inc

FACILITY DESCRIPTION	replacement of dryer for the 1,000 gal encapsulation system; chapter 31 replacing 08-1173 issued 3-4-87.	CITY/TWP	Vandalia

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	27.37