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: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**

UNION COUNTY
Application No: 01-08847
Fac ID: 0180010008

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

DATE: 11/9/2004

The Scotts Co
Todd Trowbridge
14111 Scottslawn Rd
Marysville, OH 43026

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 11/9/2004**

Terms and Conditions **Effective Date: 11/9/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08847

Application Number: 01-08847

Facility ID: 0180010008

Permit Fee: **$0**

Name of Facility: The Scotts Co

Person to Contact: Todd Trowbridge

Address: 14111 Scottslawn Rd
Marysville, OH 43026

Location of proposed air contaminant source(s) [emissions unit(s)]:
14111 Scottslawn Rd
Marysville, Ohio

Description of proposed emissions unit(s):
Pesticide Blenders.

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the

previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06**.**
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or

condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and 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. Permit Transfers

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

4. Termination of Permit To Install

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

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	12.0
PE	6.6

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P069 - System 1 Pesticide Blender vented to a baghouse and carbon adsorber (modification to PTI 01-08847, issued 06/08/04)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.9 pound per hour and 4.0 tons per year. Particulate emissions (PE) shall not exceed 0.5 pound per hour and 2.2 tons per year. Visible PE from the outlet stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average. See A.I.2.a and A.I.2.c below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

2.a The OC emission limitations of 0.9 pound per hour and 4.0 tons per year were established to reflect the potentials to emit for this emissions unit as vented through a carbon adsorber when a blending liquid organic material as defined by OAC rule 3745-21-01(C)(3). The OC emissions from all non-liquid organic materials blended in this emissions unit are able to meet the emission limitations for OC at potential to emit without the use of the carbon adsorber.

The PE emission limitations of 0.5 pound per hour and 2.2 tons per year were established to reflect the potentials to emit for this emissions unit as vented to a baghouse.

Therefore, the monitoring of the carbon adsorber and baghouse as established in the following terms and conditions may be used to ensure ongoing compliance with these emission limitations.

2.b The carbon adsorber controlling the OC emissions from this emissions unit also controls the OC emissions from emissions units P070 and P106. See Section A.V.1.a below.

2.c The permittee shall vent all particulate emissions from this emissions unit to the baghouse whenever this emissions unit is in operation, except for brief periods of time when the operator of the emissions unit opens the blender door to inspect the blender operation and a small amount of particulates from the blender door opening may be emitted into the building housing this emissions unit. Due to the very small, unquantifiable amount of particulate matter that could be released from the opening of the blender door, no additional emission limitations, monitoring, record keeping, or reporting requirements were deemed necessary to address the potential release of this particulate matter from the building housing this emissions unit.

II. Operational Restrictions

1. The permittee shall properly install, operate, and maintain a carbon adsorber to control the OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is blending a liquid organic material.

2. The activated carbon in the carbon adsorber shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted hourly OC emission limitation above (i.e., 0.72 pound/hour or 40 ppm, as isobutylene).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records that document (a) any time periods when the emissions unit was in operation and the baghouse was not in service, and (b) any time periods when the emissions unit was in operation and the baghouse was not in service, and (b) any time periods when the emissions unit was blending a liquid organic material and the carbon adsorber was not in service.

2. The permittee shall properly operate and maintain equipment to monitor the OC concentration of the outlet gases from the carbon adsorber when the emissions unit is in operation. The equipment shall meet the specifications and performance criteria of Section 6.0 of Method 21 (40 CFR Part 60, Appendix A) to be considered a compliant monitoring device. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

   The permittee shall collect and record the following information on a twice per month basis when the emissions unit is blending a liquid organic material:

   a. the OC concentration of the outlet gas from the carbon adsorber, in ppm (the permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device measures several different concentrations);

b. the production rate of the emissions unit at the time the OC concentration is recorded, in tons per hour, for the purpose of ensuring that the OC concentration is recorded at or near maximum production; and

c. if the maximum concentration exceeded 40 ppm, as isobutylene, a record indicating the date and time the activated carbon was replaced.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the outlet 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:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the visible emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

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

a. all occurrences in which the OC concentration of the outlet gas of the carbon adsorber exceeded 40 ppm (0.72 lb OC/hr) and the adsober's activated carbon was not replaced within five days. (the reports shall also include each day the activated carbon was replaced);

b. any time when the emissions unit was in operation and the baghouse was not in service; and

c. any time periods when the emissions unit was blending a liquid organic material and the carbon adsorber was not in service.

These reports shall be submitted to the Ohio EPA, Central District Office as specified in paragraph A.1.c.ii. of the General Terms and Conditions.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the outlet stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. 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.

3. The permittee shall also submit annual reports that specify the total particulate and organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and

identifying the specific emission data for this emissions unit in the annual Fee Emission Report, in accordance with OAC rule 3745-78-02 and Ohio EPA Engineering Guide 71.

V. Testing Requirements

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

   a. Emission Limitation:
   OC emissions shall not exceed 0.9 pound per hour
   PE shall not exceed 0.5 pound per hour

   Applicable Compliance Method:
   To determine compliance with the hourly OC and PE limitation, the permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

   i. The emission testing shall be conducted within 180 days after the issuance of this permit when the emissions unit is blending a "worst case" liquid organic material.

   ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for PE and OC.

   iii. The following test methods shall be employed to demonstrate compliance with the hourly emission limitations: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 25 and/or 25A for OC and 40 CFR Part 60, Appendix A, Methods 1-5 for PE. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

   iv The emission test(s) shall be conducted at the outlet of the carbon adsorber stack serving these emissions units with all three of the blenders (emissions units P036, P070, and P106) in operation or with the total number of blenders representative of those typically in operation. The blenders shall be operating at or near their maximum capacities during the emissions tests, unless otherwise specified or approved by the Ohio EPA, Central District Office. In addition, the permittee shall perform visible emission readings in accordance with U.S. EPA Method 22 during each test run.

   v. The total OC and PE emissions from these emissions units shall not exceed the sum of the OC and PE emission limitations for the emissions units that are in operation during the emission testing.

   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 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 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 Ohio EPA, Central District Office.

b. Emission Limitations:
OC emissions shall not exceed 4.0 tons per year.
PE shall not exceed 2.2 tons per year

Applicable Compliance Method:
Compliance with the annual emission limitations shall be assumed as long as compliance with the hourly emission limitations is maintained (the annual emission limitations were calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000). Compliance with the hourly emission limitations shall be determined through the emission testing required in Section A.V.1.a. above.

c. Emission Limitation:
Visible PE from the outlet stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9. .

VI. Miscellaneous Requirements

1. The terms and conditions of this permit supersede those identified as applicable to emissions unit P069 in PTI 01- 8847, issued June 8, 2004.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P069 - System 1 Pesticide Blender vented to a baghouse and carbon adsorber	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P069, P070, and P106 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The 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:

   Pollutant: Hexylene Glycol
   TLV: 121.4 mg/m3
   Maximum Hourly Emission Rate: 2.7 lbs/hr
   Predicted 1-Hour Maximum Ground-Level Concentration: 927 ug/m3
   MAGLC: 2889.8 ug/m3

   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 (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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P070 - System 3 Pesticide Blender vented to a baghouse and carbon adsorber (modification to PTI 01-8847, issued 06/08/2004)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.9 pound per hour and 4.0 tons per year. Particulate emissions (PE) shall not exceed 0.5 pound per hour and 2.2 tons per year. Visible PE from the outlet stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average. See A.I.2.a and A.I.2.c below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitations specified by these rules are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The OC emission limitations of 0.9 pound per hour and 4.0 tons per year were established to reflect the potentials to emit for this emissions unit as vented through a carbon adsorber when blending a liquid organic material as defined by OAC rule 3745-21-01(C)(3). The OC emissions from all non-liquid organic materials blended in this emissions unit are able to meet the emission limitations for OC at potential to emit without the use of the carbon adsorber.

The PE emission limitations of 0.5 pound per hour and 2.2 tons per year were established to reflect the potentials to emit for this emissions unit as vented to a baghouse.

Therefore, the monitoring of the carbon adsorber and baghouse as established in the following terms and conditions may be used to ensure ongoing compliance with these emission limitations.

2.b The carbon adsorber controlling the OC emissions from this emissions unit also controls the OC emissions from emissions units P069, and P106. See Section A.V.1.a below.

2.c The permittee shall vent all the particulate emissions from this emissions unit to the baghouse whenever this emissions unit is in operation, except for brief periods of time when the operator of the emissions unit opens the blender door to inspect the blender operation and a small amount of particulates from the blender door opening may be emitted into the building housing this emissions unit. Due to the very small, unquantifiable amount of particulate matter that could be released from the opening of the blender door, no additional emission limitations, monitoring, record keeping, or reporting requirements were deemed necessary to address the potential release of this particulate matter from the building housing this emissions unit.

II. Operational Restrictions

1. The permittee shall properly install, operate, and maintain a carbon adsorber to control the OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is blending a liquid organic material.

2. The activated carbon in the carbon adsorber shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted hourly OC emission limitation above (i.e., 0.72 pound/hour or 40 ppm, as isobutylene).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records that document (a) any time periods when the emissions unit was in operation and the baghouse was not in service, and (b) any time periods when the emissions unit was blending a liquid organic material and the carbon adsorber was not in service.

2. The permittee shall properly operate and maintain equipment to monitor the OC concentration of the outlet gases from the carbon adsorber when the emissions unit is in operation. The equipment shall meet the specifications and performance criteria of Section 6.0 of Method 21 (40 CFR Part 60, Appendix A) to be considered a compliant monitoring device. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

   The permittee shall collect and record the following information on a twice per month basis when the emissions unit is blending a liquid organic material:

   a. the OC concentration of the outlet gas from the carbon adsorber, in ppm (the permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device measures several different concentrations);

b. the production rate of the emissions unit at the time the OC concentration is recorded, in tons per hour, for the purpose of ensuring that the OC concentration is recorded at or near maximum production; and

c. if the maximum concentration exceeded 40 ppm, as isobutylene, a record indicating the date and time the activated carbon was replaced.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the outlet 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:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the visible emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

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

a. all occurrences in which the OC concentration of the outlet gas of the carbon adsorber exceeded 40 ppm (0.72 lb OC/hr) and the adsorber's activated carbon was not replaced within five days (the reports shall also include each day the activated carbon was replaced);

b. any time periods when the emissions unit was in operation and the baghouse was not in service; and

c. any time periods when the emissions unit was blending a liquid organic material and the carbon adsorber was not in service.

These reports shall be submitted to the Ohio EPA, Central District Office as specified in paragraph A.1.c.ii. of the General Terms and Conditions.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the outlet stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. 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.

3. The permittee shall also submit annual reports that specify the total particulate and organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report, in accordance with OAC rule 3745-78-02 and Ohio EPA Engineering Guide 71.

V. Testing Requirements

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

   a. Emission Limitation:
   OC emissions shall not exceed 0.9 pound per hour
   PE shall not exceed 0.5 pound per hour

   Applicable Compliance Method:
   To determine compliance with the hourly OC and PE limitation, the permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

   i. The emission testing shall be conducted within 180 days after issuance of this permit when the emissions unit is blending a "worst case" liquid organic material.

   ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for PE and OC.

   iii. The following test methods shall be employed to demonstrate compliance with the hourly emission limitations: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 25 and/or 25A for OC and 40 CFR Part 60, Appendix A, Methods 1 - 5 for PE. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

   iv. The emission test(s) shall be conducted at the outlet of the carbon adsorber stack serving these emissions units with all three of the blenders (emissions units P069, P070, and P106) in operation or with the total number of blenders representative of those typically in operation. The blenders shall be operating at or near their maximum capacities during the emission tests, unless otherwise specified or approved by Ohio EPA, Central District Office. In addition, the permittee shall perform visible emission readings in accordance with U.S. EPA Method 22 during each test run.

   v. The total OC and PE emissions from these emissions units shall not exceed the sum of the OC and PE emission limitations for the emissions units that are in operation during the emission testing.

   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 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 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 Ohio EPA, Central District Office.

b. Emission Limitations:
OC emissions shall not exceed 4.0 tons per year.
PE shall not exceed 2.2 tons per year

Applicable Compliance Method:
Compliance with the annual emission limitations shall be assumed as long as compliance with the hourly emission limitations is maintained (the annual emission limitations were calculated by multiplying the hourly emission limitations by 8760, and then dividing by 2000). Compliance with the hourly emission limitations shall be determined through the emission testing required in Section A.V.1.a. above.

c. Emission Limitation:
Visible PE from the outlet stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined though visible emissions observations performed in accordance with 40 CFR Par 60, Appendix A, Method 9

VI. Miscellaneous Requirements

1. The terms and conditions of this permit supersede those identified as applicable to emissions unit P070 in PTI 01-8847, issued June 8, 2004.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P070 - System 3 Pesticide Blender vented to a baghouse and carbon adsorber	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P069, P070, and P106 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The 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:

   Pollutant: Hexylene Glycol
   TLV: 121.4 mg/m3
   Maximum Hourly Emission Rate: 2.7 lbs/hr
   Predicted 1-Hour Maximum Ground-Level Concentration: 927 ug/m3
   MAGLC: 2889.8 ug/m3

   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 (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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P106 - System 2 Pesticide Blender vented to a baghouse and carbon adsorber (modification to PTI 01-8847, issued 06/08/04)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.9 pound per hour and 4.0 tons per year. Particulate emissions (PE) shall not exceed 0.5 pound per hour and 2.2 tons per year. Visible PE from the outlet stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average. See A.I.2.a and A.I.2.c below.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

2.a The OC emission limitations of 0.9 pound per hour and 4.0 tons per year were established to reflect the potentials to emit for this emissions unit as vented through a carbon adsorber when blending a liquid organic material as defined by OAC rule 3745-21-01(C)(3). The OC emissions from all non-liquid organic materials blended in this emissions unit are able to meet the emission limitations for OC at potential to emit without the use of the carbon adsorber.

The PE emission limitations of 0.5 pound per hour and tons per year were established to reflect the potentials to emit for this emissions unit as vented to a baghouse.

Therefore, the monitoring of the carbon adsorber and baghouse as established in the following terms and conditions may be used to ensure ongoing compliance with these emission limitations.

2.b The carbon adsorber controlling the OC emissions from this emissions unit also controls the OC emissions from emissions units P069, and P070 See Section A.V.1.a below.

2.c The permittee shall vent all the particulate emissions from this emissions unit to the baghouse whenever this emissions unit is in operation, except for brief periods of time when the operator of the emissions unit opens the blender door to inspect the blender operation and a small amount of particulates from the blender door opening may be emitted into the building housing this emissions unit. Due to the very small, unquantifiable amount of particulate matter that could be released from the opening of the blender door, no additional emission limitations, monitoring, record keeping, or reporting requirements were deemed necessary to address the potential release of this particulate matter from the building housing this emissions unit.

II. Operational Restrictions

1. The permittee shall properly install, operate, and maintain a carbon adsorber to control the OC emissions from this emissions unit. The carbon adsorber must be in operation at all times the emissions unit is blending a liquid organic material.

2. The activated carbon in the carbon adsorber shall be replaced within five days whenever the outlet gas concentration of the carbon adsorber exceeds 80% of the permitted hourly OC emission limitation above (i.e., 0.72 pound/hour or 40 ppm, as isobutylene).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records that document (a) any time periods when the emissions unit was in operation and the baghouse was not in service, and (b) any time periods when the emissions unit was blending a liquid organic material and the carbon adsorber was not in service.

2. The permittee shall properly operate and maintain equipment to monitor the OC concentration of the outlet gases from the carbon adsorber when the emissions unit is in operation. The equipment shall meet the specifications and performance criteria of Section 6.0 of Method 21 (40 CFR Part 60, Appendix A) to be considered a compliant monitoring device. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

   The permittee shall collect and record the following information on a twice per month basis when the emissions unit is blending a liquid organic material:

   a. the OC concentration of the outlet gas from the carbon adsorber, in ppm (the permittee shall record the maximum OC concentration of the outlet gas when the probe of the monitoring device measures several different concentrations);

b. the production rate of the emissions unit at the time the OC concentration is recorded, in tons per hour, for the purpose of ensuring that the OC concentration is recorded at or near maximum production; and

c. if the maximum concentration exceeded 40 ppm, as isobutylene, a record indicating the date and time the activated carbon was replaced.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the outlet 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:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the visible emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

IV. Reporting Requirements

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

a. all occurrences in which the OC concentration of the outlet gas of the carbon adsorber exceeded 40 ppm (0.72 lb OC/hr) and the adsorber's activated carbon was not replaced within five days (the reports shall also include each day the activated carbon was replaced);

b. any time periods when the emissions unit was in operation and the baghouse was not in service; and

c. any time periods when the emissions unit was blending a liquid organic material and the carbon adsorber was not in service.

These reports shall be submitted to the Ohio EPA, Central District Office as specified in paragraph A.1.c.ii. of the General Terms and Conditions.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the outlet stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. 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.

3. The permittee shall also submit annual reports that specify the total particulate and organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report, in accordance with OAC rule 3745-78-02 and Ohio EPA Engineering Guide 71.

V. Testing Requirements

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

   a. Emission Limitation:
   OC emissions shall not exceed 0.9 pound per hour
   PE shall not exceed 0.5 pound per hour

   Applicable Compliance Method:
   To determine compliance with the hourly OC and PE limitations, the permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

   i. The emission testing shall be conducted within 180 days after issuance of this permit when the emissions unit is blending a "worst case" liquid organic material.

   ii. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations for PE and OC.

   iii. The following test methods shall be employed to demonstrate compliance with the hourly emission limitations: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 25 and/or 25A for OC and 40 CFR Part 60, Appendix A, Methods 1 - 5 for PE. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

   iv. The emission test(s) shall be conducted at the outlet of the carbon adsorber stack serving these emissions units with all three of the blenders (emissions units P069, P070, and P106) in operation or with the total number of blenders representative of those typically in operation. The blenders shall be operating at or near their maximum capacities during the emission tests, unless otherwise specified or approved by Ohio EPA, Central District Office. In addition, the permittee shall perform visible emission readings in accordance with U.S. EPA Method 22 during each test run.

   v. The total OC and PE emissions from these emissions units shall not exceed the sum of the OC and PE emission limitations for the emissions units that are in operation during the emission testing.

   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 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 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 Ohio EPA, Central District Office.

b. Emission Limitations:
OC emissions shall not exceed 4.0 tons per year.
PE shall not exceed 2.2 tons per year

Applicable Compliance Method:
Compliance with the annual emission limitations shall be assumed as long as compliance with the hourly emission limitations is maintained (the annual emission limitations were calculated by multiplying the hourly emission limitations by 8760, and then dividing by 2000). Compliance with the hourly emission limitations shall be determined through the emission testing required in Section A.V.1.a. above.

c. Emission Limitation:
Visible PE from the outlet stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

1. The terms and conditions of this permit supersede those identified as applicable to emissions unit P106 in PTI 01-8847, issued June 8, 2004.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P106 - System 2 Pesticide Blender vented to a baghouse and carbon adsorber (modification to PTI 01-8696, issued 5/01/03)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P069, P070, and P106 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The 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:

   Pollutant: Hexylene Glycol
   TLV: 121.4 mg/m3
   Maximum Hourly Emission Rate: 2.7 lbs/hr
   Predicted 1-Hour Maximum Ground-Level Concentration: 927 ug/m3
   MAGLC: 2889.8 ug/m3

   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 (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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None