



State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

07/17/97

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

02-47-04-0079  
Aztec Peroxides Inc.  
John W. Wharton  
555 Garden Street  
Elyria, OH 44035

Dear John W. Wharton:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Northeast District Office.

Very truly yours,

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

cc: USEPA  
Jim Orlemann, DAPC Engineering  
Michael Ahern, DAPC PMU  
Northeast District Office



## Ohio EPA

State of Ohio Environmental Protection Agency

### TITLE V PERMIT

Issue Date: 07/17/97

### DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Aztec Peroxides Inc.  
555 Garden Street  
Elyria, OH 44035

of a Title V permit for Facility ID: 02-47-04-0079

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

N002 (Incinerator)

Liquid injection hazardous waste incinerator.

P001 (B02)

Benzoyl peroxide process unit.

P006 (B11)

Liquid organic peroxide process unit.

P009 (B05)

Liquid organic peroxide blending unit.

P010 (B14)

Liquid organic peroxide process unit.

Z008 (WWTP)

Wastewater Treatment Plant

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(216) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Director

# PART I - GENERAL TERMS AND CONDITIONS

## A. State and Federally Enforceable Section

### 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 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 information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06.

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.

- 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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.

## **8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

## **9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

## **10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-07.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

## **11. 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.

## **12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.

- 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before March 15th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

#### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-02(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

#### **15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

#### **16. Off Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

## **B. State Only Enforceable Section**

### **1. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **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.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforcable Section

None

### B. State Only Enforceable Section

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

B005- natural gas fired boiler  
B006- natural gas fired boiler  
P012- organic peroxide blend tank  
P013- tanker blending operation  
T001- 7500 gallon benzoyl chloride storage tank  
T002- 6000 gallon ethylene glycol storage tank  
T003- 7500 gallon pivaloyl chloride storage tank  
T004- 7500 gallon 2-ethylhexanoyl chloride storage tank  
T006- 6000 gallon mineral oil storage tank  
T007- 6000 gallon ethylene glycol storage tank  
T008- 6000 gallon ethylene glycol storage tank  
T009- 4000 gallon benzoyl chloride storage tank  
T010- 7500 gallon acetic anhydride storage tank  
T011- 10000 gallon mineral spirits storage tank  
T012- 10000 gallon tert-butyl hydroperoxide storage tank  
T013- 6000 gallon ethylene glycol storage tank  
T014- 8500 gallon ethylbenzene storage tank  
T015- 7500 gallon tert-butyl alcohol storage tank  
T016- 14000 gallon organic peroxide storage tank  
T017- 6000 gallon sulfuric acid storage tank  
T018- 6000 gallon sulfuric acid storage tank  
T019- 6000 gallon sulfuric acid storage tank  
T020- 13000 gallon sodium hydroxide storage tank  
T021- 7500 gallon magnesium hydroxide storage tank  
T022- 11000 gallon 50% hydrogen peroxide storage tank  
T023- 10000 gallon mineral oil storage tank  
T024- 8000 gallon potassium hydroxide storage tank  
T025- 1300 gallon liquid nitrogen storage tank  
T026- 6000 gallon 70% hydrogen peroxide storage tank

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

Facility Name: **Aztec Peroxides, Inc.**  
Facility ID: **02-47-04-0079**

**B. State Only Enforceable Section (continued)**

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

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

**Emissions Unit ID:** Incinerator (N002)

**Activity Description:** Liquid injection hazardous waste incinerator.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Liquid waste incinerator, rated at 135 lbs/hr	OAC Rule 3745-17-09(B)	PM: 0.10 lb per 100 lbs of waste charged
	OAC Rule 3745-17-07(A)(1)	visible particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. This incinerator, including all associated equipment and grounds, shall be designed, operated and maintained to prevent the emission of objectionable odors.
2. The combustion chamber for this incinerator shall be maintained so that the exit gas is at a minimum temperature of 1400 degrees Fahrenheit.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion chamber's exhaust gas temperature. Units shall be in degrees Fahrenheit. Accuracy for each thermocouple, monitor recorder shall be guaranteed by the manufacturer to be within +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall collect and record the following information each day:
  - a. A log or record of operating time for the monitoring equipment and the emissions unit.
  - b. A record of any period of time when waste was being incinerated and the combustion chamber's exit gas temperature was less than 1400 degrees Fahrenheit.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which provide the following information for each period during which the combustion chamber's exhaust gas temperatures fall below 1400 degrees Fahrenheit:
  - a. the date of the excursion;
  - b. the time interval over which the excursion occurred;
  - c. the temperature values during the excursion;
  - d. the cause(s) for the excursion; and
  - e. the corrective action which has been or will be taken to prevent similar excursions in the future.

### **V. Testing Requirements**

1. Compliance with the particulate matter emission limit of 0.10 lb per 100 lbs of waste charged shall be determined in accordance with OAC Rule 3745-17-03(B)(8).
2. Compliance with the visible emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with OAC rule 3745-17-03(B)(1).

Facility Name: **Aztec Peroxides, Inc.**

Facility ID: **02-47-04-0079**

Emissions Unit: **Incinerator (N002)**

## **V. Testing Requirements (continued)**

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted 6 months prior to the expiration of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate matter.
  - c. The following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulate matter, Methods 1-5.

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.

4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Liquid waste incinerator, rated at 135 lbs/hr	PTI #19-101	PM: 0.10 lbs per 100 lbs of waste charged and 0.08 gr/dscf @ 12% CO <sub>2</sub> , whichever is more stringent
	PTI #19-101	SO <sub>2</sub> : 0.126 lb/MMBTU actual heat input
	PTI #19-101	CO: 0.245 lb/MMBTU actual heat input
	PTI #19-101	HCl: 4.0 lbs/hr

**2. Additional Terms and Conditions**

- 2.a Start up of the incinerator shall begin with the heating of the cold combustion zone with natural gas, distillate fuel oil, liquified petroleum gas or waste materials which have been classified as hazardous solely due to their ignitibility. Alternate fuels may not be used unless the Director of the Ohio EPA has granted prior written approval. Feeding of waste materials to the incinerator shall not commence until the temperature in the combustion chamber has reached or exceeded 1400 degrees Fahrenheit.

**II. Operational Restrictions**

None

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

1. The permittee shall maintain a daily record of the materials burned in the incinerator. This record shall contain at a minimum:
  - a. The hours of operation.
  - b. The composition and average hourly feed rate of each waste material charged.
  - c. The average hourly actual heat input to the incinerator.

### IV. Reporting Requirements

1. The permittee shall submit annual reports which provide the following information for the previous calendar year:
  - a. the total amount of waste incinerated, in tons;
  - b. the total hours of operation;
  - c. an identification of all hours of operation during which the charge rate exceeded the incinerator's design capacity, including the actual charge rates for all such hours of operation; and
  - d. the date of the most recent calibration of the temperature monitor and recorder and the name of the contractor who performed the service.

These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year.

2. **None**

### V. Testing Requirements

1. Compliance with the particulate matter emission limits of 0.10 lb per 100 lbs of waste charged and 0.08 gr/dscf @ 12% CO<sub>2</sub> shall be determined in accordance with OAC Rule 3745-17-03(B)(8).
2. Compliance with the sulfur dioxide emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with OAC Rule 3745-18-04(A).
3. Compliance with the carbon monoxide emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with Method 10 of 40 CFR Part 60, Appendix A.
4. Compliance with the hydrogen chloride emission limitation in Section B.I. of these terms and conditions shall be determined in accordance with Methods 26 or 26A of 40 CFR Part 60, Appendix A.

Facility Name: **Aztec Peroxides, Inc.**

Facility ID: **02-47-04-0079**

Emissions Unit: **Incinerator (N002)**

## **V. Testing Requirements (continued)**

5. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted 6 months prior to the expiration of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate matter, carbon monoxide, sulfur dioxide and hydrogen chloride.
  - c. The following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulate matter, Methods 1-5; for carbon monoxide, Method 10; for sulfur dioxide, Method 6 or 6C; for hydrogen chloride, Method 26 or 26A.

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.

6. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

## **VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** B02 (P001)

**Activity Description:** Benzoyl peroxide process unit.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Reactor for benzoyl peroxide equipped with a wet scrubber, building #2	OAC 3745-21-07(G)(2)	See additional terms and conditions

##### 2. Additional Terms and Conditions

- 2.a This emissions unit shall not employ organic liquids which are photochemically reactive materials, as defined in OAC Rule 3745-21-01(C)(5).

##### II. Operational Restrictions

None

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

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
  - a. The identification of the chemical compound and its physical state.
  - b. For any liquid organic materials, whether or not the material is a photochemically reactive material as defined in OAC 3745-21-01(C)(5).

Facility Name: **Aztec Peroxides, Inc.**

Facility ID: **02-47-04-0079**

Emissions Unit: **B02 (P001)**

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any photochemically reactive materials were employed.

#### **V. Testing Requirements**

**None**

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property,  
and/or Equipment**

**Applicable Rules/  
Requirements**

**Applicable Emissions  
Limitations/Control  
Measures**

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** B11 (P006)

**Activity Description:** Liquid organic peroxide process unit.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Building 11 equipment for organic peroxide production: weigh tanks, blend tanks, reactor, wash tanks, filters. Two stage packed bed scrubber.	OAC 3745-21-07(G)(2)	See additional terms and conditions

**2. Additional Terms and Conditions**

- 2.a This emissions unit shall not employ organic liquids which are photochemically reactive materials, as defined in OAC Rule 3745-21-01(C)(5).

**II. Operational Restrictions**

**None**

Facility Name: **Aztec Peroxides, Inc.**

Facility ID: **02-47-04-0079**

Emissions Unit: **B11 (P006)**

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

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
  - a. The identification of the chemical compound and its physical state.
  - b. For any liquid organic materials, whether or not the material is a photochemically reactive material as defined in OAC 3745-21-01(C)(5).

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any photochemically reactive materials were employed.

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Building 11 equipment for organic peroxide production: weigh tanks, blend tanks, reactor, wash tanks, filters. Two stage packed bed scrubber.	OAC rule 3745-15-07	See operational restrictions

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

1. The pH of the scrubber liquor shall be maintained at or above 11.
2. The total scrubber water flow rate shall be continuously maintained at a value of not less than 120 gallons per minute at all times while the emissions unit is in operation.
3. The pressure drop across the scrubber shall be maintained at a value of between 1 and 6 inches of water at all times while the emissions unit is in operation.

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

1. The permittee shall properly operate and maintain equipment to monitor and record the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The pH of the scrubber liquor on 4-hour intervals.
  - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The pressure drop across the scrubber, in inches of water, on a daily basis.
- b. The scrubber water flow rate, in gallons per minute, on a daily basis.

### IV. Reporting Requirements

1. The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirement specified above.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at the required levels:
  - a. The static pressure drop across the scrubber.
  - b. The scrubber water flow rate.

Facility Name: **Aztec Peroxides, Inc.**

Facility ID: **02-47-04-0079**

Emissions Unit: **B11 (P006)**

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.
  - b. The emission testing shall be conducted to demonstrate that the control efficiency of the packed bed tower for organic compounds has not degraded.
  - c. The following test method(s) shall be employed to determine the control efficiency of the scrubber: Method 25 or 25A of 40 CFR Part 60, Appendix A.
  - 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.
  - e. 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. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

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

**Emissions Unit ID:** B05 (P009)

**Activity Description:** Liquid organic peroxide blending unit.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Four blend tanks for organic peroxide blending: building 5	OAC 3745-21-07(G)(2)	emission of organic compounds shall not exceed 8 lbs/hr and 40 lbs/day

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

None

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

1. The permittee shall keep the following records each day this emissions unit operates:
  - a. The identification of the chemical compound and its physical state.
  - b. For any liquid organic materials, whether or not the material is a photochemically reactive material as defined in OAC 3745-21-01(C)(5).
  - c. The number of hours of operation.
  - d. An estimate of the daily organic compound emission rate (pounds).
  - e. An estimate of the average hourly organic compound emission rate (pounds).

The estimate of OC emissions shall be determined by a material balance or shall be based on the 1993 study performed by Centaurus Technology: "Evaluation of Organic Vapor Loss from Ventilation Air Flow in Blend Tank V-101 Containing Dicumyl peroxide and Aromatic-100 solvent".

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the blend tanks exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .
  - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the blend tanks exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

### **V. Testing Requirements**

1. If required, organic compound emissions shall be determined in accordance with the following method(s):  
Method 25 or 25A of 40 CFR Part 60, Appendix A.

### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property,  
and/or Equipment**

**Applicable Rules/  
Requirements**

**Applicable Emissions  
Limitations/Control  
Measures**

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** B14 (P010)

**Activity Description:** Liquid organic peroxide process unit.

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Building 14 equipment for liquid organic peroxide production: 2 wash tanks	OAC Rule 3745-17-11(B)(1)	particulate matter emissions shall not exceed 0.551 lb/hr
Building 14 equipment for liquid organic peroxide production: 2 wash tanks	OAC Rule 3745-17-07(A)(1)	visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
Building 14 equipment for liquid organic peroxide production: weigh tank and V101 reactor, V102 reactor, K101 stripping column with refrigerated column, product packout	OAC Rule 3745-21-07(G)(2)	See additional terms and condition

**2. Additional Terms and Conditions**

- 2.a This emissions unit shall not employ organic liquids which are photochemically reactive materials, as defined in OAC Rule 3745-21-01(C)(5).

## **II. Operational Restrictions**

**None**

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

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
  - a. The identification of the chemical compound and its physical state.
  - b. For any liquid organic materials, whether or not the material is photochemically reactive material as defined in OAC Rule 3745-21-01(C)(5).

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which any photochemically reactive materials were employed.

## **V. Testing Requirements**

1. Compliance with the particulate matter emission limit of 0.551 pounds per hour shall be determined in accordance with OAC Rule 3745-17-03(B)(10). No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC Rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in Section A.I.
2. Compliance with the visible emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s): OAC rule 3745-17-03(B)(1).

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Building 14 equipment for liquid organic peroxide production: 2 wash tanks	PTI # 02-8364	particulate matter emissions shall not exceed 0.03 gr/dscf of exhaust gases, 0.1 lb/hr and 0.44 tons per year
Building 14 equipment for liquid organic peroxide production: weigh tank and V101 reactor	PTI # 02-8364	organic compound emissions shall not exceed 0.1 lb/hr
Building 14 equipment for liquid organic peroxide production: V102 reactor	PTI # 02-8364	organic compound emissions shall not exceed 0.1 lb/hr
Building 14 equipment for liquid organic peroxide production: product packout	PTI # 02-8364	organic compound emissions shall not exceed 0.1 lb/hr
Building 14 equipment for liquid organic peroxide production: K101 stripping column with refrigerated condenser	PTI # 02-8364	organic compound emissions shall not exceed 2.69 lbs/hr and 10.76 lbs/day

**2. Additional Terms and Conditions**

1. Annual emissions of organic compounds from this emissions unit shall not exceed 3.28 tons.

**II. Operational Restrictions**

1. The maximum number of batches per year of 2,5-Di and 2,5-Tri combined shall not exceed 731.
2. The average temperature of the exhaust gases from the condenser, for any 1-hour block of time when the stripping column is in operation, shall not be more than 11 degrees Fahrenheit above the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## II. Operational Restrictions (continued)

3. A carbon dioxide gas blanketing system shall be used on the V101 and V102 reactors when those reactors contain liquid organic material. The gas blanketing system shall be in operation at all times, except for when it is necessary for the operator to enter the cell in which the reactors are located. The gas flow rate into the reactors shall not be less than 80% of the average gas flow rate during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records on the number of batches of liquid organic peroxides produced in this emissions unit.
2. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the exhaust gases from the condenser when the K101 stripping column is in operation. The temperature shall be recorded every 15 minutes on the batch sheet. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The average temperature of the exhaust gases from the condenser during each 1-hour block of time during the day.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall continuously monitor and record the flow rate of carbon dioxide gas used to blanket reactors V101 and V102.

## IV. Reporting Requirements

1. The permittee shall submit an annual report which summarizes the total number of batches produced in this emissions unit per year. This report shall be submitted by January 31 of each year.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 1-hour block of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.
3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the flow rate of the carbon dioxide blanketing gas was less than 80% of the average gas flow rate during the most recent emission test that demonstrated the emissions unit was in compliance.

## V. Testing Requirements

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

Emission Limitation: OC emissions limited to 3.28 TPY.

Applicable Compliance Method: Compliance with the stated OC emission limitation shall be determined by calculations using a compilation of annual hours of operation of this emissions unit and the actual emission rate determined by stack testing.

Emission Limitation: PM emissions limited to 0.44 TPY

Applicable Compliance Method: Compliance with the stated PM emission limitation shall be determined by calculations using a compilation of annual hours of operation of this emissions unit and the PM emission rate stated in the technical data included with the application for PTI No. 02-8364.

2. Compliance with the particulate matter emission limitations of 0.03 gr/dscf and 0.1 lb/hr shall be determined in accordance with OAC Rule 3745-17-03(B)(10). No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC Rule 3745-15-04(A).
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit renewal.
  - b. The emission testing shall be conducted to demonstrate compliance with the mass emission limit for VOC from the stripping column (K101), the V101 reactor and the V102 reactor.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 18, 25 or 25A of 40 CFR Part 60, Appendix A.
  - 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.

Facility Name: **Aztec Peroxides, Inc.**

Facility ID: **02-47-04-0079**

Emissions Unit: **B14 (P010)**

## **V. Testing Requirements (continued)**

4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

## **VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** WWTP (Z008)

**Activity Description:** Wastewater Treatment Plant

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wastewater treatment plant: vertical loop reactor and activated sludge.	OAC 3745-21-07(F)	See additional terms and conditions

##### 2. Additional Terms and Conditions

- 2.a This emissions unit shall not be subject to the control requirements of OAC 3745-21-07(F) provided that the wastewater separator, as defined in OAC 3745-21-01(C)(2), recovers less than 200 gallons per day of volatile photochemically reactive material, as defined in OAC Rule 3745-21-01(C)(7).

##### II. Operational Restrictions

None

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

1. The permittee shall maintain daily records of all materials recovered in the wastewater separator. Each record shall contain at a minimum:
  - a. The number of gallons recovered.
  - b. An identification of whether or not the recovered material is a volatile photochemically reactive material.

Facility Name: **Aztec Peroxides, Inc.**  
Facility ID: **02-47-04-0079**  
Emissions Unit: **WWTP (Z008)**

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. For the days when volatile photochemically reactive material is recovered in an effluent water separator, an identification of each day that more than 200 gallons of volatile photochemically reactive material was recovered, and the actual amount recovered.

#### **V. Testing Requirements**

**None**

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wastewater treatment plant: vertical loop reactor and activated sludge.	PTI # 02-10572	organic compound emissions shall not exceed 63.9 tons/year

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

1. In accordance with the BAT determination in PTI # 02-10572, effective November 6, 1996, the permittee shall minimize organic compound emissions from the wastewater treatment plant by employing a diffused air system with activated sludge.

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

**None**

**IV. Reporting Requirements**

1. 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.

Facility Name: **Aztec Peroxides, Inc.**

Facility ID: **02-47-04-0079**

Emissions Unit: **WWTP (Z008)**

## **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions limitation: 63.9 tons organic compounds/year

Applicable Compliance Method: AP-42 (1996), Section 4.3 "Wastewater collection, treatment and storage".  
Use computer modeling program: "Surface Impoundment Modeling System" (SIMS) or an equivalent program to estimate OC emissions.

## **VI. Miscellaneous Requirements**

**None**

Facility Name: **Aztec Peroxides, Inc.**  
Facility ID: **02-47-04-0079**

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