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

10/31/01

CERTIFIED MAIL

RE: Preliminary Proposed Title V
Chapter 3745-77 permit

14-31-07-0039
Hilton Davis Co.
William D. Wiegele
2235 Langdon Farm Rd.
Cincinnati, OH 45237-4712

Dear William D. Wiegele:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 01/31/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

Thomas G. Rigo

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

cc: Hamilton County Dept. of Environmental Services
File, DAPC PMU

State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 10/31/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 14-31-07-0039 to:

Hilton Davis Co.
2235 Langdon Farm Rd.
Cincinnati, OH 45237-4712

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B007 (B007) Boiler No. 4	B010 (B010) Boiler No. 7	P801 (P801) Plant-wide Equipment Leaks
B009 (B009) Boiler No. 6	P154 (P154) Thermal Oxidizer	

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
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 <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 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. 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. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring, recordkeeping, and reporting requirements</u> 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 3745-77-08.

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 April 30th 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 3745-77-01(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.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

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.

8. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> 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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. 40 CFR Part 68 is an applicable requirement for this facility. The permittee shall comply with the Risk Management Plan submitted to the Hamilton County Department of Environmental Services.

2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

3. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.

B. State Only Enforceable Section

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

B001 Dow Therm Heaters;
F001 Coal Handling 09-I;
F002 Fly Ash Handling 09-I;
P159 Wastewater Pretreatment 52-II;
P160 Packout 41-I;
P168 Packout 41-II;
P172 Sizing, Packing Food Colors 01-I;
P173 Sizing, Packing Food Colors 02-II;
P174 Packout 10-I;
P175 Dye Reaction 06-I;
P177 Pigment Packout 08-I;
P178 Pigment Packout 08-II;
P179 Boiler 40-I;
P180 Food Color Packaging 40-I;
P181 Dye Filtration 36-I;
P184 Granularizing Food Colors 01-I;
P187 Pigment Flushing 39-I;
P188 Dye Drying 21-II;
P189 Pigment Salt Milling 39-I;
P190 Dye Blending 10-I;
P193 Dye Material Handling and Packout 14-I;
P194 Pigment Flushing 10-V;

B. State Only Enforceable Section (continued)

P200 Dye Drying 41-I;
P207 Dye Drying 41-II;
P208 Dye Drying 41-III;
P209 Seal Water Cooling 41-I;
P215 Dye Drying 21-I;
P222 Dye Grinding and Blending 41-I;
P223 Dye Reaction 36-I;
P224 Dye Reaction 36-II;
P225 Dye Reaction 36-III;
P226 Dye Reaction 36-IV;
P227 Condensate Recovery 36-I;
P228 Mother Liquor Handling 36-I;
P229 Wash Preparation 36-I;
P230 Dye Reaction 36-VI;
P231 Dye Reaction 36-VII;
P232 Dye Reaction 36-X;
P233 Dye Salting 36-I;
P234 Dye Slurry Holding 36-I;
P237 Dye Mixing and Milling 36-II;
P238 Dye Blending 36-I;
P239 Separation and Filtration 14-VIII;
P240 Dye Reaction 36-IX;
P241 Dye Reaction 36-V;
P242 Condensate Recovery 36-II;
P243 Dye Reaction 36-VIII;
P245 Dye Reaction 20-I;
P246 Tray Drying 10-I;
P249 Tray Drying 10-II;
P250 Dye Reaction 10-I;
P251 Dye Clarification 20-I;

P261 Tray Drying 10-III;
P263 Tray Drying 10-IV;
P266 Tray Drying 10-V;
P282 Packout 21-I;
P284 Dye Drying 14-I;
P295 Dye Mfg. 12-I;
P296 Dye Reaction 12-I;
P297 Tray Drying 08-I;

B. State Only Enforceable Section (continued)

P305 Dye Reaction 14-VII;
P313 Dye Reaction 12-II;
P314 Dye Reaction 12-III;
P315 Separation/Filtration 12-I;
P316 Dry Reaction 12-IV;
P317 Dye Sulfonation 12-XIV;
P318 Dye Sulfonation 12-XV;
P319 Dye Sulfonation 12-I;
P320 Dye Sulfonation 12-II;
P321 Dye Sulfonation 12-III;
P322 Dye Sulfonation 12-IV;
P323 Dye Sulfonation 12-V;
P324 Dye Sulfonation 12-VI;
P325 Dye Sulfonation 12-VII;
P326 Dye Sulfonation 12-VIII;
P327 Dye Sulfonation 12-IX;
P328 Dye Sulfonation 12-X;
P329 Dye Sulfonation 12-XI;
P330 Dye Sulfonation 12-XII;
P331 Dye Sulfonation 12-XIII;
P332 Separation/Filtration 12-II;
P333 Separation/Filtration 12-IV;
P334 Separation/Filtration 12-V;
P335 Pigment Mfg. 12-II;
P336 Separation/Filtration 12-VII;
P337 Separation/Filtration 12-VIII;
P338 Pigment Mfg. 12-I;
P339 Dye Mfg. 12-II;
P340 Dye Mfg. 12-V;
P341 Dye Mfg. 12-VI;
P342 Dye Reaction 12-III;
P343 Dye Mfg. 12-III;
P344 Dye Mfg. 12-IV;
P345 Dye Mfg. 12-V;
P346 Dye Mfg. 12-VI;
P347 Dye Mfg. 12-VII;
P348 Dye Mfg. 12-VIII;
P349 Dye Mfg. 12-IX;
P350 Pigment Milling 12-I;
P351 Dye Reaction 12-VIII;
P352 Dye Mfg. XI;
P353 Separation/Filtration 12-X;
P354 Separation/Filtration 12-XI;
P355 Separation/Filtration 12 XII;
P356 Pigment Milling 12-II;
P357 Separation/Filtration 12-XIV;
P358 Dye Mfg. 12-XIII;
P359 Separation/Filtration 12-12-XV;

B. State Only Enforceable Section (continued)

P360 Dye Mfg. 12-XIII;
P361 Dye Mfg. 12 XIV;
P362 Dye Mfg. 12-XV;
P363 Tray Drying 08-II;
P364 Tray Drying 08-III;
P365 Tray Drying 08-V;
P366 Vacuum Drying 08-I;
P367 Pigment Mfg. 08-I;
P368 Pigment Mfg. 08-II;
P369 Pigment Mfg. 08-III;
P370 Pigment Mfg. 08-IV;
P371 Diazo Pigment Reaction 08-II;
P372 Diazo Pigment Reaction 08-I;
P373 Gringing Blending, Packing Dyes 08-I;
P374 Gringing Blending, Packing Dyes 08-II;
P379 Varnish and Misc. Reaction 12-I;
P380 Varnish Mfg. 12-I;
P381 Varnish and Misc. Reaction 13-II;
P382 Varnish and Misc. Reaction 13-III;
P383 Packout 01-I;
P384 Packout 02-I;
P385 Tray Drying 02-I;
P386 Tray Drying 02-II;
P387 Food Color Mfg. 02-I;
P388 Tray Drying 01-I;
P389 Vacuum Drying 01-I;
P390 Spray Drying 02-I;
P391 Drum Drying Food Colors 020I;
P392 Liquid Color Solutions 02-I;
P393 Pilot Plant Reaction 35-I;
P394 Pilot Plant Reaction 35-II;
P395 Pilot Plant Vacuum Tray Drying 35-I;
P396 Pilot Plant Reaction 35-VI;
P397 Pilot Plant Vacuum Drying 35-I;
P398 Pilot Plant Tray Drying 35-I;
P399 Sizing,Packing Food Colors 02-III;

B. State Only Enforceable Section (continued)

P400 Sizing,Packing Food Colors 02-II;
P401 Varnish and Misc. Reaction 13-IV;
P402 Pilot Plant Reaction 35-VIII;
P403 Pilot Plant Reaction 35-IX;
P404 Pilot Plant Reaction 35-X;
P405 Grinding,Blending, Packing Dyes 08-I;
P406 Grinding,Blending, Packing Dyes 08-II;
P407 Grinding,Packing Pigments 08-I;
P408 Pigment Filtration 08-I;
P409 Pigment Flushing 10-I;
P410 Pigment Flushing 10-II;
P411 Pigment Flushing 10-III;
P412 Pigment Flushing 10-IV;
P413 Pigment Flushing 10-VI;
P414 Pigment Flushing 10-VII;
P415 Pigment Flushing 10-VIII;
P416 Pigment Flushing 10-IX;
P417 Pigment Flushing 10-X;
P418 Pigment Flushing 10-XI;
P419 Pigment Flushing 10-XII;
P420 Pigment Flushing 10-XIII;
P421 Pigment Flushing 10-V;
P422 Spray Drying Food Colors;
P423 Pigment Dispersing 10-I;
P424 Pigment Milling 12-III;
P425 Separation/Filtration 12-XVII;
P426 Separation/Filtration 12-IX;
P427 Dye Mfg.12-XVII;
P428 Dye Mfg. 12-XVIII;
P429 Dye Mfg. 12-XIX;
P430 Pigment Mfg. 08-VI;
P431 Pigment Mfg. 08-VII;
P432 Pigment Mfg. 08-VIII;
P433 Pigment Mfg. 08-IX;
P434 Pigment Mfg. 08-X;

B. State Only Enforceable Section (continued)

P435 Pigment Mfg. 08-XI;
P436 Pigment Mfg. 08-XII;
P437 Pigment Mfg. 08-XIII;
P438 Pigment Mfg. 08-XIV;
P439 Pigment Mfg. 08-XV;
P441 Pigment Mfg. 12-III;
P442 Pigment Mfg. 12-IV;
P443 Pigment Mfg. 12-V;
P444 Pigment Mfg. 12-VI;
P445 Pigment Mfg. 12-VII;
P446 Pigment Mfg. 12-VIII;
P447 Pigment Mfg. 12-IX;
P448 Pigment Mfg. 12-X;
P449 Pigment Mfg. 12-XI;
P450 Pigment Mfg. 12-XII;
P451 Pigment Mfg. 12-XIII;
P452 Pigment Mixing 12-III;
P453 Pigment Mixing 12-1;
P454 Pigment Mixing 12-II;
P455 Pigment Dispersion 12-I;
P456 Pigment Dispersion 12- II;
P457 Liquid Color Solutions 02-II;
P459 Tank TF-XXV;
P460 Tank 14-VIII;
P461 Pigment Dispersion 12-IV;
P462 Milled Pigments;
P466 Grinding/ Blending 21-I;
P467 Pigment Mfg. 12-XV;
P468 Pigment Mfg. 12-XVI;
P469 Solvent Storage 12-I;

P470 FD&C Lakes Blending;
P473 Pigment Mfg. 12-XVII;
P474 Pigment Mfg. 12-XVIII;
P475 Pigment Mfg. 12-XIX;
T002 Tank 14-III;
T006 Tank 54-I;
T013 Tank 12-IV;
T014 Tank 12-III;
T015 Tank 03-I;
T020 Tank 41-VI;
T023 Tank 13-I;
T024 Tank 13-II;
T025 Tank 13-III;
T026 Tank 13-IV;
T027 Tank 13-V;
T028 Tank 13-IX;
T029 Tank 13-VII;
T030 Tank 13-VIII;
T035 Tank 20-XIII;
T037 Tank 20-XV;
T038 Tank 20-X;
T039 Tank 20-XII;
T042 Tank 54-II;
T047 Tank 21-IV;
T055 Tank TF-XX;
T056 Tank TF-XXI;
T061 Tank TF-VIII;
T066 Tank TF-XIII;
T067 Tank 21-II;
T069 Tank 36-VII;

B. State Only Enforceable Section (continued)

T070	Tank 36-V;
T073	Tank 36-VI;
T077	Tank 24-1;
T078	Tank 09-I;
T079	Tank TF-II;
T080	Tank TF-V;
T081	Tank TF-VI;
T082	Tank TF-VII;
T085	Tank 21-VI;
T087	Tank TF-I;
T088	Tank TF-IX;
T089	Tank TF-X;
T090	Tank TF-XII;
T091	Tank 21-III;
T092	Tank 14-V;
T093	Tank 21-I;
T094	Tank 14-I;
T095	Tank 54-III;
T096	Tank 14-IV;
T097	Tank 20-V;
T098	Tank 41-II;
T099	Tank 41-III;
T100	Tank 41-IV;
T101	Tank 41-V;
T102	Tank 41-VII;
T103	Tank 41-VIII;
T104	Tank 41-IX;
T105	Tank TF-XXIV;
T106	Tank TF-XXVI;
T107	Tank TF-XXVII;
T108	Tank 20-XVII;
T109	Tank 54-IV;
T110	Tank 14-VI;
T111	Tank 14-VII;
T112	Tank 20-I;
T113	Tank TF-XVIII;
T114	Tank 20-II;
T115	Tank TF-XXII;
T116	Tank 36-I;
T117	Tank 21-V;
T118	Tank 41-V; and
T119	Tank 36-IV.

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B007 (B007)

Activity Description: Boiler No. 4

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
37.2 mmBtu/hr natural gas-fired boiler	OAC rule 3745-31-05(A)(3) (PTI 14-1841)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-10(B)(1).
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	.020 lb PE/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

V. Testing Requirements (continued)

2. Compliance with the PE limitation of .020 lb/mmBtu of actual heat input may be determined by multiplying the hourly gas burning capacity of the emissions unit (.0372 mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (37.2 mmBtu/hr).

If required, compliance with the PE limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

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: B009 (B009)

Activity Description: Boiler No. 6

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(C)(1)	PE shall not exceed 0.21 lb/mmBtu of actual heat input (based on a total heat input of 90 mmBtu/hr).
	OAC rule 3745-18-37(E)(2)	Sulfur dioxide emissions shall not exceed 1.88 lbs/mmBtu of actual heat input.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall have a combination of sulfur and heat content sufficient to demonstrate compliance with the sulfur dioxide emission limitation in section A.I.1.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a frequency of three days per week. Each sample shall be collected from the hopper above the stoker. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.

The permittee shall maintain monthly records of the total quantity of coal burned, the results of the analyses for ash content, sulfur content, and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu).

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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 abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Quarterly reports shall be submitted concerning the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. The total quantity of coal burned (tons).

b. The average ash content (percent) of the coal burned.

c. The average sulfur content (percent) of the coal burned.

d. The average heat content (Btu/pound) of the coal burned.

e. The average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal burned. The sulfur dioxide emission rate shall be calculated using the equation specified in OAC rule 3745-18-04(G) and the results of the fuel analyses recorded in section A.III.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

2. Compliance with the PE limitation shall be determined in accordance with the emission testing requirements specified in section A.V.4.

3. Compliance with the sulfur dioxide emission limitation shall be determined in accordance with the emission testing requirements specified in section A.V.4. Compliance with this emission limitation may also be determined based upon the records required pursuant to section A.III.2.

4. 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 after issuance of this permit, approximately 2.5 years after issuance of this permit, and within 6 months prior to the expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the particulate and sulfur dioxide emission limitations in section A.I.1.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9) for particulate emissions; and

Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-18-04(D)(7) for sulfur dioxide emissions.

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

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

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

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

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
90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone		

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. During periods of low steam demand (equal to or less than 20,000 pounds of steam per hour), this emissions unit shall be taken out of operation.

2. The steaming of coal (while in the hopper) to control emissions, shall continue during operation of this emissions unit.

3. The pressure drop across the multiclone shall be continuously maintained at a value of not less than 3.5 inches of water at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks and magnitude of manual calibration adjustments.

2. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the multiclone while the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The permitee shall monitor and record, at least once per operating hour, the pressure drop across the multiclone, in inches of water.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit quarterly reports identifying all recorded instances during which the pressure drop across the multiclone serving this emissions unit dropped below 3.5 inches inches of water. These reports shall include the date, duration, pressure drop range, and corrective action taken during these occurences to increase the pressure drop above 3.5 inches of water.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step-by-step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B010 (B010)

Activity Description: Boiler No. 7

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
119.4 mmBtu/hr natural gas/number two fuel oil-fired boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-37(E)(3)	1.2 lbs sulfur dioxide/mmBtu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

2. The quality of the oil burned in this emissions unit shall have a combination of sulfur and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.2 lbs/mmBtu actual heat input.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.

For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall notify the Director (the Hamilton County Department of Environmental Services) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Hamilton County Department of Environmental Services) within 45 days after the deviation occurs.

V. Testing Requirements

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

2. When burning natural gas, compliance with the PE limitation of .020 lb of PE/mmBtu of actual heat input may be determined by multiplying the hourly gas burning capacity of the emissions unit (.1194 mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (119.4 mmBtu/hr).

When burning number two fuel oil, compliance with the PE limitation of .020 lb of PE/mmBtu of actual heat input may be determined by multiplying the maximum fuel oil capacity of the emissions unit (865 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (119.4 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation above through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9) while burning number two fuel oil.

3. Compliance with the sulfur dioxide emission limitation in section A.I.1 shall be determined in accordance with the emission testing requirements specified in section A.V.4. Compliance with this emission limitation may also be determined based upon the records required pursuant to section A.III.2.

4. 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 after issuance of this permit and within 6 months prior to the expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the sulfur dioxide emission limitation in section A.I.1.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-18-04(E)(5) for sulfur dioxide emissions.

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

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

V. Testing Requirements (continued)

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

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

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: P154 (P154)

Activity Description: Thermal Oxidizer

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wastewater pretreatment (plantwide) controlled with thermal oxidizer	OAC rule 3745-31-05(A)(3) (PTI 14-2096)	Organic compound (OC) emissions shall not exceed 7.6 lbs/hr* HCl emissions shall not exceed 10.73 lbs/hr* See A.I.2.a and A.II below. *The lbs/hr emission limitations are based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.
	OAC rule 3745-21-07(G)	The requirements established pursuant to this rule are equivalent to or less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The best available technology (BAT) determination for this emissions unit includes the use of covered tanks vented to a thermal oxidizer having a minimum control efficiency of 98% at maximum load. At lower operating rates this emissions unit is not required to meet the 98% control efficiency requirement, provided the pounds per hour emission rate for OC is achieved at all times.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1400 degrees Fahrenheit.

2. The thermal oxidizer shall be designed and maintained in such a manner as to insure a minimum 1.0 second retention time for the exhaust gases at 1400 degrees Fahrenheit.

II. Operational Restrictions (continued)

3. The permitee shall operate and maintain an audible or visible alarm in the control room to alert plant personnel as to a 'flame out' condition or a combustion temperature within the thermal oxidizer below 1400 degrees Fahrenheit.

4. The covers over the wastewater treatment tanks shall be maintained under negative pressure and vented to the thermal oxidizer.

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 temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1400 degrees Fahrenheit.

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

2. The permittee shall perform monthly inspections to determine the presence of vapor (air emissions) leaks from the wastewater tank system. This inspection program shall follow the methods specified in Permit to Install 14-2096. For purposes of this program, a "vapor leak" shall be defined as concentrations that are greater than 25% of the LEL.

The permittee shall monitor the air around the perimeter of the treatment tanks, air stripping columns, around any vapor seals on the covers of the wastewater treatment plant, and other areas containing seals within the air stripping system. This monitoring shall be conducted using a portable LEL measuring unit, "TLV Sniffer" (or equivalent device as approved by the Director).

If readings are detected that are greater than 25% of the LEL, the vapor leak shall be corrected as soon as possible. All leaks shall be corrected within two (2) weeks of detection. The location of a vapor leak shall be identified immediately with a tag or placard and shall remain in place until the leak is corrected. The operator shall maintain a log of the monthly inspections including the readings and locations of any vapor leaks along with the type of repairs made.

3. The permittee shall record on a daily basis all periods of downtime for the control system for the wastewater treatment system which results in the venting of stripped or aerated organics from the wastewater system into the ambient air and the total hours of operation for the waste water treatment system. On an annual basis, the permittee shall total these downtimes and the total hours of operation of the wastewater organic removal system. Should the total downtime exceed 1% of the total operating time of the removal system, the permittee shall install monitoring equipment in the exhaust stack serving the thermal oxider and submit a written malfunction abatement plan to the Hamilton County Department of Environmental Services. The monitoring device shall continuously monitor and record the OC emission concentration in the exhaust stream. In addition to the information required under paragraph (D) of OAC rule 3745-15-06, the malfunction abatement plan shall include a summary of causes for the downtimes recorded, the corrections made, the parts needed to return the unit to service and the measures the permittee will take to improve performance reliability of the control system. Nothing in this term shall be construed as a waiver from all other requirements contained in OAC rule 3745-15-06.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above. Each report shall be submitted within 30 days after the deviation occurs.

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that identify any monthly record recorded in section A.III.2 which demonstrates a vapor leak from the waste water treatment system. This report shall include the location of the leak, the concentration of OC present at the leaking location, the reason for the leak, and the date the leak was repaired. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit annual reports detailing the total downtime of the waste water treatment system. These reports, at a minimum, shall include the total hours of operation of the wastewater treatment system, the total downtime of the wastewater treatment system, and the reason for each period of downtime. These reports shall be submitted by January 31 of each year and cover the previous years operation.

V. Testing Requirements

1. Emission testing requirements:

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 3 months after issuance of the permit, approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for OC and HCl, the control efficiency limitation for OC, and the 1.0 second retention time for the thermal oxidizer.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for the hourly OC emission limitation and the OC control efficiency limitation, 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25; for the hourly HCl emissions, 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

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 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."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

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: P801 (P801)

Activity Description: Plant-wide Equipment Leaks

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
plant-wide equipment leaks	OAC rule 3745-21-09(DD)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a There are process units at the facility that produce, as an intermediate or final product, one or more of the organic chemicals identified in Appendix A of OAC rule 3745-21-09; however, pursuant to OAC rule 3745-21-09(DD)(17), these process units are currently exempt from the requirements of OAC rules 3745-21-09(DD)(2) through (6).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records identifying all process units that produce, as an intermediate or final product, one or more of the organic chemicals identified in Appendix A of OAC rule 3745-21-09.

IV. Reporting Requirements

1. Should the permittee plan to modify its process or change its raw materials in such a manner as to no longer be exempt from the requirements of OAC rules 3745-21-09(DD)(2) through (6), the permittee shall notify the Hamilton County Department of Environmental Services prior to making such a modification or change.

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

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