OhioEPA

State of Ohio Environmental Protection Agency

# Permit to Install
# Terms and Conditions

Application No. 14-2096
APS Premise No. 1431070039
Permit Fee: $200.00

Name of Facility: HILTON DAVIS CO

Person to Contact: MARK MILLER

Address: 2235 LANGDON FARM ROAD
CINCINNATI, OH 45237

Location of proposed source(s): 2235 LANGDON FARM ROAD
CINCINNATI, OHIO

Description of proposed source(s):
MODIFICATION TO PTI-05-2505, AN INDUSTRIAL WASTEWATER TREATM ENT FACILITY WITH COVERS AND THERMAL OXIDIZER.

Date of Issuance: June 12, 1991

Effective Date: June 12, 1991

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

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TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months, if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a $15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

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

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| Ohio EPA Source Number | Source Identification/ Description | BAT Determination | Applicable Federal and OAC Rules | Permit Allowable Mass Emissions and/ or Control & Usage Requirements |
|---|---|---|---|---|
| P160 | Wastewater Treatment Facility | * See Below | 3745-31-05<br>3745-15-07<br>3745-17-07<br>3745-21-07 | 7.6 lbs VOC/hr (maximum potential)<br>17.76 TPY VOC<br>10.73 lbs HCl/hr (maximum potential)<br>21.7 TPY HCl |

* BAT is the use of covered tanks vented to a thermal oxidizer at 98% control efficiency at maximum operating rate. At lower operating rates this unit may not achieve the 98% control efficiency, provided the pounds per hour emission rate is achieved at all times.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Tons/Year |
|---|---|
| VOC | 17.76 |
| HCl | 21.7 |

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

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1. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

2. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

3. Tests shall be performed for the following sources and pollutants:

| Source | Pollutant(s) |
|---|---|
| P160 | VOC (controlled & uncontrolled)<br>HCl |

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than two years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to SW Ohio Air Pollution Control Agency 1632 Central Parkway, Cincinnati, Ohio 45210.

MAINTENANCE OF EQUIPMENT

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This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the SW Ohio Air Pollution Control Agency, 1632 Central Parkway, Cincinnati, Ohio 45210.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance test conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

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

2. Hilton Davis shall operate the thermal oxidizer in accordance with the following requirements:

   a. 1400°F minimum temperature or higher if needed to achieve 98% control efficiency within the design limits of this thermal oxidizer; and

   b. 1.0 second retention time minimum.

3. Any condition (malfunction or otherwise) which results in emissions to the ambient air in excess of the limits specified in this permit constitutes a violation of Ohio Revised Code (ORC) Section 3704.05(c).

4. In addition to other recordkeeping required in this permit, the Hilton Davis Company shall record all periods of down time for the control system described in this permit which results in the venting of stripped or aerated organics from the wastewater system into the ambient air. On an annual (calendar year) basis, Hilton Davis shall total these down times and the total hours of operation of the wastewater organic removal system. Should the total down time exceed 1% of the total operating time of the removal system, Hilton Davis shall install monitoring equipment in the exhaust stack serving the thermal oxidizer and submit a written malfunction abatement plan to the SWOAPCA. The monitoring device shall continuously monitor and record the VOC concentration in the exhaust stream. In addition to the information required under Section (D) of OAC Rule 3745-15-06, the malfunction abatement plan should include a summary of causes for the down times recorded, the corrections made, the parts needed to return the unit to service and the measures Hilton Davis 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. This report shall be submitted by April 15 and shall cover the previous calendar year. For purposes of establishing whether annual down time exceeds 1% of the total operating time of the removal system, any down time for the control system described in this permit occurring prior to the initial demonstration of compliance required under OAC Rule 3745-35-02 (C) (not to exceed 90 days from the date of startup of the modified system) shall not be included in the calculation of annual down time for the initial calendar year.

5. Hilton Davis shall continue to maintain and operate a sensoring device capable of monitoring and recording the operating temperature of the thermal oxidizer. Semiannual reports due by April 15 and October 15 of each year, which summarize all periods of time during which the control equipment failed to maintain the 1400°F shall be submitted to the SWOAPCA.

   Hilton Davis shall continue to maintain and operate an audible or visual alarm in the control room to warn plant personnel whenever there is a "flame-out" on the thermal oxidizer there is a temperature less than 1400°F in the thermal oxidzer.

6. The facility shall continue to maintain and operate a continuous monitor for measuring the gaseous hydrocarbon levels under the covers on the wastewater treatment plant cells 2 through 6 and prior to the thermal oxidizer. This device, known as a Lower Explosive Level (LEL) monitor, is to measure the hydrocarbon content of the gas stream.

7. Hilton Davis shall continue the monthly vapor leak detection program for air emissions around the wastewater tank system. Hilton Davis shall incorporate into this detection program the air stripping processes outlined in this Permit to Install. For purposes of this program, a "vapor leak" shall be defined as concentrations that are greater than 25% of the LEL. Hilton Davis shall monitor the air around the perimeter of the tank or air stripping columns, in the area of any vapor seals on the covers of the wastewater treatment plant or 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, Hilton Davis shall take action to correct the vapor leak 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.

8. The "terms and conditions" as outlined in this permit supersedes those "terms and conditions" (as they pertain to compliance with Ohio Administrative Code rules for air pollution) associated and incorporated in Wastewater Permit to Install 05-2505.

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9. The facility shall provide a report to the SWOAPCA by April 15 of each year of the annual emissions from the wastewater treatment plant. The determination of annual emissions shall be based upon the sampling of the wastewater and the results of the stack test.

10. Annual summaries of the monthly leak detection logs, including the date leaks were detected, the date they were repaired and the type of repair made shall be submitted to the SWOAPCA by April 15 of each year.

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