



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
LUCAS COUNTY
Application No: 04-00962

DATE: 5/28/2002

BEC Laboratories, Inc.
Doug Hyer
705 Front St.
Toledo, OH 43605

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

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

TDES



**Permit To Install
Terms and Conditions**

**Issue Date: 5/28/2002
Effective Date: 5/28/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 04-00962

Application Number: **04-00962**
APS Premise Number: **0448011623**
Permit Fee: **\$0**
Name of Facility: **BEC Laboratories, Inc.**
Person to Contact: **Doug Hyer**
Address: **705 Front St.
Toledo, OH 43605**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**615 Front St.
Toledo, OHIO**

Description of modification:
Ethylene oxide sterilization chamber with an acid-water scrubber for control.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

BEC Laboratories, Inc.

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GENERAL PERMIT CONDITIONS

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 SOURCES

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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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.

SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **Biological & Environmental Control Laboratories, Inc.** located in **Lucas** 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.

| <u>Ohio EPA Source Number</u> | <u>Source Identification/Description</u> | <u>BAT Determination</u> | <u>Applicable Federal and OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u> |
|-------------------------------|--|--|--|--|
| P003 | Ethylene Oxide Sterilizer #2 | Scrubber for Control of Ethylene Oxide | 3745-31-05 NESHAP for Ethylene Oxide Commercial Sterilization and Fumigation Operations | 0.11 lbs/hr of Ethylene Oxide for 99% Reduction of ethylene oxide emissions from the sterilization chamber vent |

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Standard Requirements Terms

1. This facility shall reduce ethylene oxide emissions to the atmosphere by at least 99 percent from each sterilization chamber vent.
2. When usage exceeds 10 tons per year, this facility shall limit ethylene oxide emissions to the atmosphere from each chamber exhaust vent by either manifolding the emissions to a control device, or reducing ethylene oxide emissions by at least 99 percent (without manifolding).

Dates of Compliance Term

3. This facility shall comply with all the applicable provisions of subpart O no later than 12/6/97.

Performance Test Requirements

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4. This facility shall conduct an initial performance test using the procedures and methods listed in 63.7 of subpart A, and section 63.363 of subpart O as well as the test methods listed in section 63.365 of subpart O. The testing shall be completed within 180 days after the compliance date.

Compliance & Performance Test Requirements

5. During the performance test, this facility shall determine the efficiency of control devices, used to comply with the emission limits, using the test methods and procedures in section 63.365(b)(1) of subpart O.

Also, this facility shall determine/establish, as a site-specific operating parameter, the maximum ethylene glycol concentration using the procedures described in section 63.365 (e)(1) of subpart O.

Following the date on which the initial performance test is completed, this facility shall be in violation of the sterilization chamber vent standard if it is operating with an ethylene glycol concentration in the scrubber liquor in excess of the maximum ethylene glycol concentration.

Monitoring Requirements

6. This facility shall comply with the applicable monitoring requirements in section 63.8 of subpart A.
7. This facility shall monitor all applicable parameters and all monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the source are obtained.

For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system.

8. This facility shall sample the scrubber liquor and analyze and record once per week (only during weeks the sterilizer was used) the ethylene glycol concentration of the scrubber liquor using the test methods and procedures in 63.365(e)(1);

Recordkeeping Requirements

9. This facility shall fulfill all applicable recordkeeping requirements of 63.10(b) and (c) of subpart A.

Reporting Requirements

10. This facility shall fulfill all reporting requirements in 63.10(a), (d), (e), and (f) of subpart A. These reports shall be sent to the Administrator on or before the specified date.
11. These reports shall be delivered or postmarked, to the Administrator, within 30 days following the end of each calendar half or quarter, as applicable according to 63.10(e)(3)(i) through (iv). Written reports of excess emissions or exceedances of process or control system parameters shall include the information from any calibration test in which the monitoring equipment is not in compliance with PS-9 or the method used for

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temperature calibration along with the following information:

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- A. The date and time of each period during which the continuous monitoring system was inoperative, except for low and high level checks, and the nature of the repairs or adjustments performed.
- B. The date and time of each period during which the continuous monitoring system was out of control, as defined in 63.8(c)(7), and the nature of the repairs or adjustments performed.
- C. The date and time of commencement and completion of each period of excess emissions and parameter monitoring exceedances that occur including during startups, shutdowns, and malfunctions of the affected source.
- D. The nature and cause of any malfunction, if known, and the corrective action taken or preventive measures adopted.
- E. The total process operating time during the reporting period and all the procedures that are part of a quality control program that is developed and implemented for the continuous monitoring systems required by 63.8(d) subpart A.

These written reports shall also include the name, title, and signature of the responsible official who is certifying the accuracy of the report. When no excess emissions, or exceedances have occurred, or monitoring equipment has not been inoperative, repaired, or adjusted, such information shall be stated in the report.

- 12. This facility shall comply with all applicable notification requirements of 63.9 of subpart A as well as Initial Notification requirements of 63.366 (c) of subpart O.
- 13. This facility shall notify the Administrator, in writing, of the intended construction or reconstruction. The notification shall be submitted as soon as practicable before such event is planned to commence. If the construction or reconstruction had commenced and the initial startup date has not occurred before 12/6/94, then the notification shall be submitted as soon as practicable before the initial startup date.

The notification shall include all the information required for an application for approval of construction or reconstruction as specified in 63.366(b)(3) of subpart O and 63.5(d)(3) and (4) of subpart A.

- 14. This facility shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status.
- 15. This facility shall submit an estimated amount of ethylene oxide that is expected to be used during the first consecutive 12-month period of operation, in the initial notification report.