



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

6/11/2013

Tracy DePugh  
AKZO NOBEL COATINGS, INC.  
1313 WINDSOR AVE  
PO BOX 489  
COLUMBUS, OH 43216

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125040064  
Permit Number: P0113140  
Permit Type: Renewal  
County: Franklin

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-CDO





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

AKZO Nobel Coatings, located in Columbus, has submitted a Renewal application for a FEPTIO, which includes proposed federally enforceable limits in order to effectively restrict the affected facility's Potential To Emit (PTE) below those levels which trigger Title V permitting requirements. This proposed Federally Enforceable Permit To Install and Operate (FEPTIO) is specific to emissions units P365-P370, P001, P002 and J002, which are all specific to the AKZO Nobel resin plant.

3. Facility Emissions and Attainment Status:

The Resin part of the facility is the original portion of the plant installed long before the existence of Ohio's air program. The other portions of this facility were installed with synthetic minor PTIs. It is Akzo's intention to maintain all of their federally enforceable limitations so as to avoid Title V permitting requirements. In the absence of federally enforceable limitations, AKZO Nobel Coatings would have a PTE of greater than 100 tons per year of VOC/ 10 tons per year of any single HAP and 25 tons per year of total HAPs based upon maximum hourly emission rates and 8,760 hours per year of operation. AKZO's PTE of each of the remaining criteria pollutants is less than 100 tons per year. A complete PTE analysis of the affected Resin emissions units is found in the table below.

4. Source Emissions:

Emissions Unit AKZO ID	Emissions Unit OEPA ID	Maximum Emission Rate (lbs/hr)			PTE (TPY) Based Upon 8,760 Hours of Operation/Year		
		VOC HAPs	Single HAP	Total	VOC	Single HAP	Total HAPs
Weigh Tank #1	P365	.182	.076	.182	.80	.33	.80
Weigh Tank #2	P366	.163	.068	.163	.71	.30	.71
TD-1100	P367	1.968	.827	1.968	8.62	3.62	8.62
TD-1200	P368	1.817	.76	1.817	7.96	3.33	7.96
TD-2300	P369	1.698	.71	1.698	7.44	3.11	7.44
TD-2400	P370	1.698	.71	1.698	7.44	3.11	7.44
Loading Rank #1	J002	.1	.04	.1	.45	.2	0.1
R-1000	P001	1.096	.46	1.096	4.80	2.01	4.80
R-2000	P002	.984	.41	.984	4.31	1.80	4.31



<b>TOTAL</b>	42.53	17.81	42.18
--------------	-------	-------	-------

Potential emission from AKZO Nobel Coatings remaining emissions units result in PTE annual emissions (based upon the federally enforceable limits in their synthetic minor PTIs) is described in the table below:

Pollutant	VOC	Any Single HAP	Total HAPs
PTE Annual Emissions	17.22	7.11	17.22

The proposed throughput operational restrictions for the affected emissions units are summarized in the table below:

Emissions Unit	Throughput (gallons per rolling 12-month period)
P365	1,200,000
P366	1,700,000
P367	200,000
P368	1,000,000
P369	850,000
P370	850,000
J002	1,000,000
P001	1,200,000
P002	1,700,000

Due to the proposed production restriction described in the above table, the PTE of the affected emissions units upon issuance of the FESOPs will be as follows:

Emission Unit	VOC	Any Single HAP	HAPs
P001	2.37	1.00	2.37
P002	3.36	1.41	3.36
P365	.0153	.01	.0153
P366	.0217	.02	.0217
P367	.06	.08	.06
P368	.32	.08	.32
P369	.27	.11	.27
P370	.27	.11	.27
J002	.15	.06	.15
<b>PTE Annual Emissions</b>	<b>6.84</b>	<b>2.88</b>	<b>6.84</b>



Therefore, AKZO's facility-wide PTE upon issuance of the FESOP will be described below:

<b>Pollutant</b>	<b>VOC</b>	<b>Any Single HAP</b>	<b>HAP</b>
PTE Annual Emissions	<b>24.06</b>	<b>9.9</b>	<b>24.06</b>

The facility and the Ohio EPA have agreed to short term emission restrictions and operational restrictions which correspond to maximum annual emissions from the affected emissions units (resin plant) of 6.84 tons VOC/yr, 6.84 tons total HAPs/yr and 2.88 tons of any single HAP/yr. The proposed FESOPs include monthly record keeping and excursion reporting to ensure continued compliance with the permitted emission limits. Moreover, the proposed FESOPs include monthly production limitations for each of the initial 12 months of operation in order to ensure compliance during the initial 12 months of operation.

5. Conclusion:

The operation of emissions units in accordance with the production limitations specified above, per 12-month rolling period, will result in maximum annual facility emissions below those levels which trigger Title V permitting requirements.

The proposed FESOPs include federally enforceable limits, record keeping, reporting and production limitations during the initial 12 months of operation to ensure continued compliance with the FESOP's requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	6.84
Single HAP	2.88
Total HAP	6.84



PUBLIC NOTICE

6/11/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

AKZO NOBEL COATINGS, INC.

1313 WINDSOR AVENUE,

Columbus, OH 43211

Franklin County

FACILITY DESC.: Paint and Coating Manufacturing

PERMIT #: P0113140

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO Renewal permit for Resin Manufacturing Process.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Todd Scarborough, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
AKZO NOBEL COATINGS, INC.**

Facility ID:	0125040064
Permit Number:	P0113140
Permit Type:	Renewal
Issued:	6/11/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
AKZO NOBEL COATINGS, INC.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	5
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. P001, Resin Kettle R-1000.....	11
2. P002, Resin Kettle R-2000.....	19
3. P365, Weigh Tank #1.....	28
4. P366, Weigh Tank #2.....	35
5. P367, TD-1100.....	42
6. P368, TD-1200.....	49
7. P369, TD-2300.....	56
8. P370, TD-2400.....	63





**Draft Permit-to-Install and Operate**

AKZO NOBEL COATINGS, INC.

**Permit Number:** P0113140

**Facility ID:** 0125040064

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0125040064  
Application Number(s): A0046541  
Permit Number: P0113140  
Permit Description: FEPTIO Renewal permit for Resin Manufacturing Process.  
Permit Type: Renewal  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 6/11/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

AKZO NOBEL COATINGS, INC.  
1313 WINDSOR AVENUE  
Columbus, OH 43211

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0113140

Permit Description: FEPTIO Renewal permit for Resin Manufacturing Process.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Resin Kettle R-1000
Superseded Permit Number:	P0082615
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Resin Kettle R-2000
Superseded Permit Number:	P0082615
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P365</b>
Company Equipment ID:	Weigh Tank #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P366</b>
Company Equipment ID:	Weigh Tank #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P367</b>
Company Equipment ID:	TD-1100
Superseded Permit Number:	P0082615
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P368</b>
Company Equipment ID:	TD-1200
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P369</b>
Company Equipment ID:	TD-2300
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P370</b>
Company Equipment ID:	TD-2400
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0113140  
**Facility ID:** 0125040064  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**



If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

---

<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Draft Permit-to-Install and Operate**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0113140  
**Facility ID:** 0125040064  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



## **C. Emissions Unit Terms and Conditions**



**1. P001, Resin Kettle R-1000**

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

1,000 gal resin kettle

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)a. through f.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compounds (VOC) emissions shall not exceed 3.95E-03 pound per gallon of resin and 2.37 tons per year as a rolling 12 month summation.</p> <p>See b)(2)a-f below.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 7.58 pounds per hour.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

(2) **Additional Terms and Conditions**



- a. Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
- b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.
- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The condenser system controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 85% when the emissions unit is in operation. The condenser system includes the condenser and the foam over tank.
- f. The emissions from this emissions unit shall be vented to the venturi scrubber at all times the reactor hatch is open.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,200,000 gallons of resin.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the venturi scrubber, that shall be maintained in order to demonstrate compliance, shall not be less than 3.0 inches of water.
- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable venturi scrubber water flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 60 gallons per minute.
- (4) The average temperature of the exhaust gases from the condenser system, for any 3-hour block of time when the emission unit(s) controlled by the condenser system is/are in operation, shall not exceed 101 degrees Fahrenheit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.



- (2) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26th, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (3) The permittee shall maintain the following daily records
  - a. Number of gallons of throughput;
  - b. The maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
  - c. The total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds; and
  - d. The total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.
  - e. The total emissions of VOC from emission unit P001, in pounds.
- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the venturi scrubber (in inches of water) and the venturi scrubber water flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the venturi scrubber and the water flow rate on continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation



ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop and flow rate immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (5) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser system when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the condenser system was/were in operation, during which the average temperature of the exhaust gases from the condenser system exceeded the range/limit established in accordance with this permit; and
  - b. a log or record of operating time for the capture (collection) system, condenser system, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.



(6) Whenever the monitored temperature of the exhaust gases from the condenser system deviates from the range/limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was deviation;
- j. the temperature readings of the exhaust gas from condenser system immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(7) The exhaust gas temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Central District Office. The permittee may request revisions to the permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:



- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, scrubber water flow rate or condenser system was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
- b. any records of downtime (date and length of time) for the capture (collection) system, the venturi scrubber, the condenser system, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
- c. a log of the operating time for the capture system, Each control device, monitoring equipment, and the emissions unit(s).
- d. all exceedances of the rolling, rolling 12-month limitation of the production rate;
- e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.
- f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(2) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the condenser system during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the condenser system was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the condenser system;
  - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases from the condenser system into compliance with the acceptable range, was determined to be necessary and was not taken; and



- e. each incident of deviation described in [a] or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in [a] or “b” (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in [a] or “b” where prompt corrective action, that would bring the pressure drop, or liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in [a] or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (5) The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. **Emission Limitations:** Particulate emissions shall not exceed 7.58 pounds per hour.
- Applicable Compliance Method If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 5.



- b. Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 3.95E-03 pound per gallon of resin  
  
Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d(2) above.
- c. Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 2.37 tons per year as a rolling 12 month summation.  
  
Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.
- d. Emission Limitation: Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.  
  
Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.
- e. Emission Limitation: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.  
  
Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.
- f. Emission Limitation: Emissions of VOC from emissions units P365-P370, J002 P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.  
  
Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.
- g. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.  
  
Applicable Compliance Method: If required, compliance 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).
- h. Emission Limitation: The condenser system controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 85% when the emissions unit is in operation.  
  
Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 18.

g) Miscellaneous Requirements

- (1) None.



**2. P002, Resin Kettle R-2000**

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

2,000 gal resin kettle

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)a. through f.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compounds (VOC) emissions shall not exceed 3.95E-03 pound per gallon of resin and 3.36 tons per year as a rolling 12 month summation.</p> <p>See b)(2)a-f below.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 13.6 pounds per hour.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.



(2) Additional Terms and Conditions

- a. Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
- b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.
- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The condenser system controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 85% when the emissions unit is in operation. The condenser system includes the condenser and the foam over tank.
- f. The emissions from this emissions unit shall be vented to the venturi scrubber at all times the reactor hatch is open.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,700,000 gallons of resin.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the venturi scrubber, that shall be maintained in order to demonstrate compliance, shall not be less than 3.0 inches of water.
- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable venturi scrubber water flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 60 gallons per minute.
- (4) The average temperature of the exhaust gases from the condenser system, for any 3-hour block of time when the emission unit(s) controlled by the condenser system is/are in operation, shall not exceed 101 degrees Fahrenheit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
- a. the production rate for each month; and



- b. the rolling, 12-month summation of the production rates.
- (2) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26th, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (3) The permittee shall maintain the following daily records
- a. Number of gallons of throughput;
  - b. The maximum amount of each individual HAP, employed, as a percentage of the total OC employed during the day;
  - c. The total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds; and
  - d. The total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.
  - e. The total emissions of VOC from emission unit P002, in pounds.
- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the venturi scrubber (in inches of water) and the venturi scrubber water flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the venturi scrubber and the water flow rate on continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this



permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop and flow rate immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (5) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser system when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the condenser system was/were in operation, during which the average temperature of the exhaust gases from the condenser system exceeded the range/limit established in accordance with this permit;; and



- b. a log or record of operating time for the capture (collection) system, condenser system, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (6) Whenever the monitored temperature of the exhaust gases from the condenser system deviates from the range/limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was deviation;
- j. the temperature readings of the exhaust gas from condenser system immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (7) The exhaust gas temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas temperature range/limit will not constitute a relaxation of the monitoring requirements of



this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, scrubber water flow rate or condenser system was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
- b. any records of downtime (date and length of time) for the capture (collection) system, the venturi scrubber, the condenser system, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
- c. a log of the operating time for the capture system, Each control device, monitoring equipment, and the emissions unit(s).
- d. all exceedances of the rolling, rolling 12-month limitation of the production rate;
- e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.
- f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(2) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the condenser system during the 12-month reporting period for this/these emissions unit(s):

- a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the condenser system was outside of the acceptable range;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the condenser system;



- c. each incident of deviation described in [a] or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in [a] or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases from the condenser system into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in [a] or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber or the liquid flow rate, was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in [a] or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in [a] or "b" where prompt corrective action, that would bring the pressure drop or liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in [a] or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (5) The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



- a. Emission Limitations: Particulate emissions shall not exceed 13.6 pounds per hour.

Applicable Compliance Method If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 5.

- b. Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 3.95E-03 pound per gallon of resin

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d(2) above.

- c. Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 3.36 tons per year as a rolling 12 month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

- d. Emission Limitation: Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

- e. Emission Limitation: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

- f. Emission Limitation: Emissions of VOC from emissions units P365-P370, J002 P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

- g. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance 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).

- f. Emission Limitation: The condenser system controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 85% when the emissions unit is in operation.



**Draft Permit-to-Install and Operate**

AKZO NOBEL COATINGS, INC.

**Permit Number:** P0113140

**Facility ID:** 0125040064

**Effective Date:** To be entered upon final issuance

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 18.

g) Miscellaneous Requirements

(1) None.



**3. P365, Weigh Tank #1**

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

Weigh Tank #1

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)a. through e.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.0153 ton per year as a rolling 12 month summation.</p> <p>See b)(2)a-e below.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

- (2) Additional Terms and Conditions
  - a. Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.



- b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.
- c. Emissions of VOC from emissions units P365-P370, J 002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control(destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,200,000 gallons of resin.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and



- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation



of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall maintain monthly records of the following information:
  - a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (6) The permittee shall maintain the following daily records
  - a. Number of gallons of throughput;
  - b. The maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
  - c. The total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds; and
  - d. The total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.
  - e. The total emissions of VOC from emission unit P365, in pounds.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).
  - d. all exceedances of the rolling, rolling 12-month limitation of the production rate;



- e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.
- f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations: The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 12 months of permit issuance.

ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

iii. The test(s) shall be conducted while emissions units P365-P370, J002, P001 and P002 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s) the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

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

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

(2) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d(5) above.



- (3) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 0.0153 ton per year as a rolling 12 month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (4) Emission Limitation: Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (5) Emission Limitation: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (6) Emission Limitation: Emissions of VOC from emissions units P365-P370, J002 P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None.



**4. P366, Weigh Tank #2**

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

Weigh Tank #2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)a. through e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compounds(VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.0217 ton per year as a rolling 12 month summation.</p> <p>See b)(2)a-e below.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.



- b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.
- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control(destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,700,000 gallons of resin.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and



- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation



of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative modification.

- (4) The permittee shall maintain monthly records of the following information:
  - a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (6) The permittee shall maintain the following daily records
  - a. Number of gallons of throughput;
  - b. The maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
  - c. The total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds; and
  - d. The total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.
  - e. The total emissions of VOC from emission unit P366, in pounds.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).
  - d. all exceedances of the rolling, rolling 12-month limitation of the production rate;



- e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.
- f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA , Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in [a] or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in [a] or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in [a] or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370,J002, P001 and P002, and e) specify the total emissions of individual HAP from emissions units P365-P370,J002, P001 and P002.

These reports shall be submitted by January 31 of each year.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations: The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 12 months of permit issuance.

ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

iii. The test(s) shall be conducted while emissions units P365-P370, J002, P001 and P002 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s) the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

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

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

(2) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d(5) above.



- (3) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 0.0217 ton per year as a rolling 12 month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (4) Emission Limitation: Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (5) Emission Limitation: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (6) Emission Limitation: Emissions of VOC from emissions units P365-P370, J002 P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None.



**5. P367, TD-1100**

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

TD 1100

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)a. through e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compounds(VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.06 ton per year as a rolling 12 month summation.</p> <p>See b)(2)a-e below.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.



- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control(destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 200,000 gallons of resin.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.



These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative modification.
- (4) The permittee shall maintain monthly records of the following information:



- a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (6) The permittee shall maintain the following daily records
- a. Number of gallons of throughput;
  - b. The maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
  - c. The total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds; and
  - d. The total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.
  - e. The total emissions of VOC from emission unit P367, in pounds.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).
  - d. all exceedances of the rolling, rolling 12-month limitation of the production rate;
  - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.
  - f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.



These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in [a] or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in [a] or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in [a] or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



- a. Emission Limitations: The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 12 months of permit issuance.
- ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.
- iii. The test(s) shall be conducted while emissions units P365-P370, J002, P001 and P002 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s) the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

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

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

- (2) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d)(5) above.

- (3) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 0.06 ton per year as a rolling 12 month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.



- (4) Emission Limitation: Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (5) Emission Limitation: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (6) Emission Limitation: Emissions of VOC from emissions units P365-P370, J002 P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None.



**6. P368, TD-1200**

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

TD 1200

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)a. through e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compounds(VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.32 ton per year as a rolling 12 month summation.</p> <p>See b)(2)a-e below.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.



- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,000,000 gallons of resin.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.



These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative modification.
- (4) The permittee shall maintain monthly records of the following information:



- a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (6) The permittee shall maintain the following daily records
- a. Number of gallons of throughput;
  - b. The maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
  - c. The total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds; and
  - d. The total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.
  - e. The total emissions of VOC from emission unit P368, in pounds.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).
  - d. all exceedances of the rolling, rolling 12-month limitation of the production rate;
  - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.
  - f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.



These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in [a] or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in [a] or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in [a] or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



- a. Emission Limitations: The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 12 months of permit issuance.
- ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.
- iii. The test(s) shall be conducted while emissions units P365-P370, J002, P001 and P002 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s) the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

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

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

- (2) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d(5) above.

- (3) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 0.32 ton per year as a rolling 12 month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.



- (4) Emission Limitation: Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (5) Emission Limitation: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (6) Emission Limitation: Emissions of VOC from emissions units P365-P370, J002 P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None



**7. P369, TD-2300**

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

TD 2300

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(2)a. through e.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compounds(VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.27 ton per year as a rolling 12 month summation.</p> <p>See b)(2)a-e below.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

- (2) Additional Terms and Conditions
  - a. Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
  - b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.



- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 850,000 gallons of resin.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.



These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative modification.
- (4) The permittee shall maintain monthly records of the following information:



- a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (6) The permittee shall maintain the following daily records
- a. Number of gallons of throughput;
  - b. The maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
  - c. The total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds; and
  - d. The total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.
  - e. The total emissions of VOC from emission unit P369, in pounds.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).
  - d. all exceedances of the rolling, rolling 12-month limitation of the production rate;
  - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.
  - f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.



These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in [a] or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in [a] or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in [a] or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



- a. Emission Limitations: The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 12 months of permit issuance.
- ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.
- iii. The test(s) shall be conducted while emissions units P365-P370, J002, P001 and P002 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s) the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

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

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

- (2) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d(5) above.

- (3) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 0.27 ton per year as a rolling 12 month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.



- (4) Emission Limitation: Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (5) Emission Limitation: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

- (6) Emission Limitation: Emissions of VOC from emissions units P365-P370, J002 P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None



8. P370, TD-2400

Operations, Property and/or Equipment Description:

TD 2400

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(2)a. through e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>Volatile Organic Compounds(VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.27 ton per year as a rolling 12 month summation.</p> <p>See b)(2)a-e below.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.



- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control(destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 850,000 gallons of resin.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.



These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative modification.



- (4) The permittee shall maintain monthly records of the following information:
    - a. the production rate for each month; and
    - b. the rolling, 12-month summation of the production rates.
  - (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
  - (6) The permittee shall maintain the following daily records
    - a. Number of gallons of throughput;
    - b. The maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
    - c. The total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds; and
    - d. The total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.
    - e. The total emissions of VOC from emission unit P370, in pounds.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
    - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).
    - d. all exceedances of the rolling, rolling 12-month limitation of the production rate;
    - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.



- f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
  - c. each incident of deviation described in [a] or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in [a] or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in [a] or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations: The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 12 months of permit issuance.
- ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.
- iii. The test(s) shall be conducted while emissions units P365-P370, J002, P001 and P002 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s) the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

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

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



- (2) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d(5) above.

- (3) Emission Limitation: Volatile Organic Compounds (VOC) emissions shall not exceed 0.27 ton per year as a rolling 12 month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d(6) above.

- (4) Emission Limitation: Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d(6) above.

- (5) Emission Limitation: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d(6) above.

- (6) Emission Limitation: Emissions of VOC from emissions units P365-P370, J002 P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d(6) above.

g) Miscellaneous Requirements

- (1) None.