



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

6/17/2013

Katherine Wiedeman  
P.H. Glatfelter Co. - Fremont Facility  
232 East 8th Street  
Chillicothe, OH 45601

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0372030100  
Permit Number: P0113382  
Permit Type: Renewal  
County: Sandusky

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:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Ohio EPA-NWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
P.H. Glatfelter Co. - Fremont Facility**

Facility ID:	0372030100
Permit Number:	P0113382
Permit Type:	Renewal
Issued:	6/17/2013
Effective:	6/17/2013
Expiration:	6/17/2018





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
P.H. Glatfelter Co. - Fremont Facility

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**Final Permit-to-Install and Operate**  
P.H. Glatfelter Co. - Fremont Facility  
**Permit Number:** P0113382  
**Facility ID:** 0372030100  
**Effective Date:** 6/17/2013

## Authorization

Facility ID: 0372030100  
Application Number(s): A0045331  
Permit Number: P0113382  
Permit Description: PTIO renewal permit for emissions units K001 (Coater no.1 ), K002 (Coater no.2) , P003 (Color Compounding Area) and P901 (Carbonless Capsule Process).  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 6/17/2013  
Effective Date: 6/17/2013  
Expiration Date: 6/17/2018  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

P.H. Glatfelter Co. - Fremont Facility  
2275 COMMERCE DR  
FREMONT, OH 43420

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

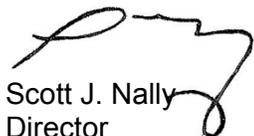
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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: P0113382  
Permit Description: PTIO renewal permit for emissions units K001 (Coater no.1 ), K002 (Coater no.2) , P003 (Color Compounding Area) and P901 (Carbonless Capsule 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>K001</b>
Company Equipment ID:	Coater #1
Superseded Permit Number:	P0087645
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	Coater #2
Superseded Permit Number:	P0087645
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Color Compounding Area
Superseded Permit Number:	P0087645
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	Capsule Plant Process
Superseded Permit Number:	P0087645
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
P.H. Glatfelter Co. - Fremont Facility  
**Permit Number:** P0113382  
**Facility ID:** 0372030100  
**Effective Date:** 6/17/2013

## **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, Northwest 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.

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<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).



**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 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.



**Final Permit-to-Install and Operate**  
P.H. Glatfelter Co. - Fremont Facility  
**Permit Number:** P0113382  
**Facility ID:** 0372030100  
**Effective Date:** 6/17/2013

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



**Final Permit-to-Install and Operate**

P.H. Glatfelter Co. - Fremont Facility

**Permit Number:** P0113382

**Facility ID:** 0372030100

**Effective Date:** 6/17/2013

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.



**Final Permit-to-Install and Operate**  
P.H. Glatfelter Co. - Fremont Facility  
**Permit Number:** P0113382  
**Facility ID:** 0372030100  
**Effective Date:** 6/17/2013

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



**1. K001, Coater #1**

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

Coater no.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. (d)(3)
  - (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. None.
- 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(A)(3)	<u>Emissions from coating operation:</u> 37.1 lbs organic compounds (OC)/hour  <u>Emissions from natural gas combustion:</u> 0.67 lb nitrogen oxides (NOx)/hr and 2.93 tons NOx/year  0.56 lb carbon monoxide (CO)/hour and 2.45 tons CO/year  See b)(2)a.
b.	OAC rule 3745-31-05(D)	77.6 tons OC per rolling, 12-month period from emissions units K001, K002 and P003 combined [See b)(2)b.]
c.	OAC rule 3745-21-09(F)	2.9 lbs VOC per gallon coating, excluding water and exempt solvents



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D).
- b. The OC emissions from emissions units K001, K002 and P003 combined shall not exceed 77.6 tons per rolling 12-month period based on a material usage restriction [see section c)(1)] and an OC content restriction [see section c)(2)].

The 77.6 tons of OC per year is a federally enforceable limitation established for purposes of avoiding Title V applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

c) Operational Restrictions

- (1) The maximum annual coating usage from K001, K002 & P003 combined shall not exceed 2,820,000 gallons, based on a rolling, 12-month summation of coating usage. 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 coating usage, upon issuance of this permit.
- (2) The OC content of the coatings employed in emissions unit K001 shall not exceed 0.055 pounds per gallon, as applied.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company name and identification of each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for cVOC,2];
  - d. the OC content, in pounds per gallon, for each coating, as applied;
  - e. the OC emission rate for each coating employed, in lbs/month [d)(1)b. x d)(1)d. for each coating employed]; and
  - f. the total monthly OC emission rate for all coatings employed, in lbs [summation of d)(1)e. for all coatings].
- (2) In conjunction with the recordkeeping requirements specified in d)(1) above, the permittee shall also record the following each month for emissions units K001, K002 and P003 combined:



- a. the rolling, 12-month OC emission rate, in tons; and
  - b. the rolling, 12-month summation of the coating usage rate, in gallons.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings that exceed the 2.9 lbs of VOC/gallon excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. All exceedances of the rolling, 12-month coatings usage restriction of 2,820,000 gallons (for emissions units K001, K002, and P003, combined).
      - ii. All exceedances of the rolling, 12-month OC emission limitation of 77.6 tons.
      - iii. All exceedances of the coating VOC content restriction of 0.055 pounds per gallon, as applied.
  - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- 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 Limitation: 37.1 lbs OC/hour

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (750 gallons per hour) by the maximum OC content of all the coatings (0.055 pounds per gallon) and applying a value of 90% as the maximum percentage of the organic compounds contained in coatings that are emitted uncontrolled from this emissions unit. The remaining 10% of the organic compounds contained in the coatings shall be considered to be uncontrolled emissions for the associated color compounding area (P003).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. Emission Limitation: 77.6 tons OC per rolling 12-month period for emissions units K001, K002 & P003 combined

Applicable Compliance Method: Compliance with this limitation shall be demonstrated through recordkeeping requirements in section d)(2) of this permit.

- c. Emission Limitation: 0.67 lb NOX/hr; 2.93 tons NOX/year from natural gas combustion from drying oven

Applicable Compliance Method: Compliance with the hourly emissions limitation shall be determined by multiplying a maximum heat input of 7.0 mmBtu/hr by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOX/million scf of natural gas, and dividing by 1050 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the NOX limitation above shall be determined in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 7.

The annual NOX emission limitation was established by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

- d. Emission Limitation: 0.56 lb CO/hr; 2.45 tons CO/year from natural gas combustion from drying oven

Applicable Compliance Method: Compliance with the hourly emissions limitation shall be determined by multiplying a maximum heat input of 7.0 mmBtu/hr by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 84 lbs CO/million scf of natural gas, and dividing by 1050 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the CO limitation above shall be determined in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.



The annual CO emission limitation was established by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

- e. Emission Limitation: 2.9 lbs VOC per gallon coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance with the VOC content limitation shall be based upon the recordkeeping requirements specified in d)(1) of this permit.

- g) Miscellaneous Requirements

- (1) None.



**2. K002, Coater #2**

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

Coater no.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. d)(3)
  - (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. None.
- 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(A)(3)	<u>Emissions from coating operation:</u> 49.5 lbs organic compounds (OC)/hour  <u>Emissions from natural gas combustion:</u> 1.33 lbs nitrogen oxides (NOx)/hr and 5.83 tons NOx/year  1.12 lbs carbon monoxide (CO)/hour and 4.91 tons CO/year  See b)(2)a.
b.	OAC rule 3745-31-05(D)	77.6 tons OC per rolling, 12-month period from emissions units K001, K002 and P003 combined [See b)(2)b.]
c.	OAC rule 3745-21-09(F)	2.9 lbs VOC per gallon coating, excluding water and exempt solvents



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D).
- b. The OC emissions from emissions units K001, K002 and P003 combined shall not exceed 77.6 tons per rolling 12-month period based on a material usage restriction [see section c)(1)] and an OC content restriction [see section c)(2)].

The 77.6 tons of OC per year is a federally enforceable limitation established for purposes of avoiding Title V applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

c) Operational Restrictions

- (1) The maximum annual coating usage from K001, K002 & P003 combined shall not exceed 2,820,000 gallons, based on a rolling, 12-month summation of coating usage. 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 coating usage, upon issuance of this permit.
- (2) The OC content of the coatings employed in emissions unit K002 shall not exceed 0.055 pounds per gallon, as applied.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company name and identification of each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for cVOC,2];
  - d. the OC content, in pounds per gallon, for each coating, as applied;
  - e. the OC emission rate for each coating employed, in lbs/month [d)(1)b. x d)(1)d. for each coating employed]; and
  - f. the total monthly OC emission rate for all coatings employed, in lbs [summation of d)(1)e. for all coatings].
- (2) In conjunction with the recordkeeping requirements specified in d)(1) above, the permittee shall also record the following each month for emissions units K001, K002 and P003 combined:



- a. the rolling, 12-month OC emission rate, in tons; and
  - b. the rolling, 12-month summation of the coating usage rate, in gallons.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (the Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings that exceed the 2.9 lbs of VOC/gallon excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. All exceedances of the rolling, 12-month coatings usage restriction of 2,820,000 gallons (for emissions units K001, K002, and P003, combined).
      - ii. All exceedances of the rolling, 12-month OC emission limitation of 77.6 tons.
      - iii. All exceedances of the coating VOC content restriction of 0.055 pounds per gallon, as applied.
  - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- 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 Limitation: 49.5 lbs OC/hour

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (1,000 gallons per hour) by the maximum OC content of all the coatings (0.055 pounds per gallon) and applying a value of 90% as the maximum percentage of the organic compounds contained in coatings that are emitted uncontrolled from this emissions unit. The remaining 10% of the organic compounds contained in the coatings shall be considered to be uncontrolled emissions for the associated color compounding area (P003).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. Emission Limitation: 77.6 tons OC per rolling 12-month period for emissions units K001, K002 & P003 combined

Applicable Compliance Method: Compliance with this limitation shall be demonstrated through recordkeeping requirements in section d)(2) of this permit.

- c. Emission Limitation: 1.33 lb NOX/hr; 5.83 tons NOX/year from natural gas combustion from drying oven

Applicable Compliance Method: Compliance with the hourly emissions limitation shall be determined by multiplying a maximum heat input of 14.0 mmBtu/hr by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOX/million scf of natural gas, and dividing by 1050 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the NOX limitation above shall be determined in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 7.

The annual NOX emission limitation was established by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

- d. Emission Limitation: 1.12 lb CO/hr; 4.91 tons CO/year from natural gas combustion from drying oven

Applicable Compliance Method: Compliance with the hourly emissions limitation shall be determined by multiplying a maximum heat input of 14.0 mmBtu/hr by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 84 lbs CO/million scf of natural gas, and dividing by 1050 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the CO limitation above shall be determined in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.



The annual CO emission limitation was established by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

- e. Emission Limitation: 2.9 lbs VOC per gallon coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance with the VOC content limitation shall be based upon the recordkeeping requirements specified in d)(1) of this permit.

- g) Miscellaneous Requirements

- (1) None.



**3. P003, Color Compounding Area**

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

Color compounding area

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. d)(3)

(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. None.

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(A)(3)	<u>Emissions from coating operation:</u> 11.0 lbs organic compounds (OC)/hour; 48.2 tons OC/year  See b)(2)a.
b.	OAC rule 3745-31-05(D)	77.6 tons OC per rolling, 12-month period from emissions units K001, K002 and P003 combined [See b)(2)b.]

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

b. The OC emissions from emissions units K001, K002 and P003 combined shall not exceed 77.6 tons per rolling 12-month period based on a material usage restriction [see section c)(1)] and an OC content restriction [see section c)(2)].



The 77.6 tons of OC per year is a federally enforceable limitation established for purposes of avoiding Title V applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

- c. The hourly and annual emission limitations represent the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) The maximum annual coating usage from K001, K002 & P003 combined shall not exceed 2,820,000 gallons, based on a rolling, 12-month summation of coating usage. 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 coating usage, upon issuance of this permit.
- (2) The OC content of the coatings mixed in emissions unit P003 shall not exceed 0.055 pounds per gallon, as applied.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company name and identification of each coating mixed;
  - b. the OC content, in pounds per gallon, for each coating mixed.
- (2) The monitoring and record keeping contained in emissions units K001 and K002 shall be used to demonstrate compliance with both the 77.6 tons OC per rolling 12-month period and the maximum annual coating usage not to exceed 2,820,000 gallons per rolling 12-month period from emissions units K001, K002 and P003 combined. Emissions unit P003 is used to mix coatings which are applied in emissions units K001 and K002. A percentage (10% maximum) of the organic compounds in the coatings is emitted during mixing operations. The remaining organic compounds contained in the coatings are emitted from emissions units K001 and K002. The monitoring and record keeping in emissions unit K001 and K002 is structured to account for all coating usage and all the organic compounds contained in the coatings. Therefore no additional monitoring and record keeping will be required for emissions unit P003 to demonstrate compliance with the above mentioned limitations.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air



contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (2) The reporting requirements contained in emissions units K001 and K002 shall be used to demonstrate compliance with both the 77.6 tons OC per rolling 12-month period and the maximum annual coating usage not to exceed 2,820,000 gallons per rolling 12-month period from emissions units K001, K002 and P003 combined. Emissions unit P003 is used to mix coatings which are applied in emissions units K001 and K002. A percentage (10% maximum) of the organic compounds in the coatings is emitted during mixing operations. The remaining organic compounds contained in the coatings are emitted from emissions units K001 and K002. The reporting requirements in emissions unit K001 and K002 is structured to address all coating usage and the organic compounds contained in the coatings. Therefore no reporting will be required for emissions unit P003 to demonstrate compliance with the above mentioned limitations.

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 Limitation: 11.0 lbs OC/hour and 48.2 tons OC/year

Applicable Compliance Method: The hourly OC emission limitation represents the potential to emit for this emissions unit. The hourly emission limitation was established by multiplying the maximum hourly coating mixing rate (2000 gallons per hour) by the maximum OC content of all the coatings (0.055 pounds per gallon) and applying a value of 10% as the maximum percentage of the organic compounds contained in the coatings that are emitted uncontrolled from this emissions unit. The remaining 90% of the organic compounds contained in the coatings shall be considered to be uncontrolled emissions for the associated coating operations (K001 & K002).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation represents the potential to emit for this emissions unit and was established by multiplying the maximum hourly emissions by a maximum operating schedule of 8,760 hours per year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with



the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

- b. Emission Limitation: 77.6 tons OC per rolling 12-month period for emissions units K001, K002 & P003 combined

Applicable Compliance Method: Compliance with this limitation shall be demonstrated through the recordkeeping requirements in section d)(2) of this permit.

- g) Miscellaneous Requirements

- (1) None.



**4. P901, Capsule Plant Process**

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

Carbonless capsule process

- 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. d)(6)
  - (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. None.
- 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(A)(3)	0.03 grain(gr) particulate emissions (PE)/dry standard cubic foot (dscf)  0.67 lb PE/hour, 2.93 tons PE/year  0.29 ton fugitive PE/year  0.78 lb organic compounds (OC)/hour, 3.42 tons OC/year  No visible fugitive PE from any building openings  No visible PE from the wet scrubber stack  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)b.



- (2) Additional Terms and Conditions
  - a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a wet scrubber and compliance with the terms and conditions of this permit.
  - b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall be between 2 to 4 pounds per square inch (gauge).
  - (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 0.54 gallons per minute.
  - (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's flow rate on daily 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 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.

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 appropriate Ohio EPA District Office or local air agency. 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 particulate 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.

- (4) The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to minimize or eliminate the visible emissions.
- (5) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed;
  - b. documentation on whether or not each liquid organic material employed is a



photochemically reactive material

- c. the OC content of each coating liquid organic material employed, as applied;
- d. the number of gallons of each liquid organic material employed;
- e. the OC emissions for each liquid organic employed, in pounds; and
- f. the total OC emissions for all of liquid organic materials employed, in tons.

(6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.
- (2) The permittee shall 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 and/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 e)(2)a. or e)(2)b. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action, that would bring the pressure drop and/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 e)(2)a. or e)(2)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.



- (3) The permittee shall also identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
  - b. any corrective actions taken to eliminate the visible emissions.
- 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. Emissions Limitation: 0.03 gr/dscf  
Applicable Compliance Method: The 0.03 gr PE/dscf limitation was established in accordance with the manufacturer's guaranteed outlet concentration. If required, compliance shall be determined in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.
  - b. Emission Limitation: 0.67 lb PE/hour, 2.93 tons PE/year  
Applicable Compliance Method: The lb/hr limitation was developed by multiplying 0.03 gr PE/dscf by the maximum volumetric air flow (2600 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr. If required, compliance shall be determined in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.  
  
The ton/year limitation was developed by multiplying the lb/hr limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.
  - c. Emission Limitation: 0.29 ton fugitive PE/year  
Applicable Compliance Method: The annual limitation was developed by applying a 99% capture efficiency to a maximum uncontrolled mass emission rate of 29.30 tons/year.
  - d. Emission Limitation: 0.78 lb OC/hr, 3.42 tons OC/year  
Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.
- \*The potential to emit is based on a minimum process yield and the conservative assumption that any unreacted process materials are emitted as OC.



The annual limitation was developed by multiplying the hourly OC emission limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

- e. Emission Limitation: No visible particulate emissions from the wet scrubber exhaust stack.

Applicable Compliance Method: If required, compliance shall be determined in accordance with the test method and procedures in Method 22 of 40 CFR, Part 60, Appendix A.

- f. Emission Limitation: No visible fugitive PE from any building openings

Applicable Compliance Method: If required, compliance shall be determined in accordance with the test method and procedures in Method 22 of 40 CFR, Part 60, Appendix A.

- g) Miscellaneous Requirements

- (1) None.