



State of Ohio Environmental Protection Agency

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RE: **FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL**
HURON COUNTY
Application No: 03-10834

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 2/8/2001

R R Donnelley & Sons Company
Christopher Hassmann
1145 Conwell Ave
Willard, OH 448880001

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

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

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

Very truly yours,

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

CC: USEPA

NWDO

Jim Orlemann, Ohio EPA / DAPC

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-10834

Application Number: **03-10834**APS Premise Number: **0339030135**Permit Fee: **\$0**Name of Facility: **R R Donnelley & Sons Company**Person to Contact: **Christopher Hassmann**Address: **1145 Conwell Ave****Willard, OH 448880001**

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1145 Conwell Ave
Willard, OHIO**

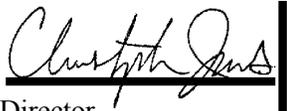
Description of modification:

Administrative modification of PTI 03-10834 issued August 24, 2000, for emissions units P021-P026 (book binding lines), and P009, P014, P015, and P027-P031 (paper separation processes).

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **R R Donnelley & Sons Company** located in **HURON** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P009	8.0 TPH Paper Separation Process Cyclone #4	Compliance with the terms and conditions of this permit.	3745-31-05	8.0 lbs of particulate emissions (PE)/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030, and P031) (See Additional Special Terms and Conditions)
P014	8.0 TPH Paper Separation Process Cyclone #6	Compliance with the terms and conditions of this permit.	3745-31-05	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030, and P031) (See Additional Special Terms and Conditions)
P015	9.9 TPH Paper Separation Process Cyclone #7	Compliance with the terms and conditions of this permit.	3745-31-05	9.9 lbs PE/hr, 24.9 tons PE/yr (See Additional Special Terms and Conditions)
P021	Solvent Dipping Operation, Book Binding Line #5	Use of only non-photochemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.	3745-31-05	3.55 lbs of organic compounds (OC)/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025,

R R Donnelley & Sons Company

PTI Application: 03-10834

Modification Issued: 2/8/2001

Facility ID: 0339030135

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P021 Cont'd				and P026) (See Additional Special Terms and Conditions)
			3745-21-07(G)	*
P022	Solvent Dipping Operation, Book Binding Line #6	Use of only non-photochemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.	3745-31-05	3.55 lbs OC/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026) (See Additional Special Terms and Conditions)
			3745-21-07(G)	*
P023	Solvent Dipping Operation, Book Binding Line #7	Use of only non-photochemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.	3745-31-05	3.55 lbs OC/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026) (See Additional Special Terms and Conditions)
			3745-21-07(G)	*
P024	Solvent Dipping Operation, Book Binding Line #9	Use of only non-photochemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.	3745-31-05	3.55 lbs OC/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026) (See Additional Special Terms and Conditions)
			3745-21-07(G)	*

R R Donnelley & Sons Company**PTI Application: 03-10834****Modification Issued: 2/8/2001**Facility ID: **0339030135**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P025	Solvent Dipping Operation, Book Binding Line #10	Use of only non-photochemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.	3745-31-05	3.91 lbs OC/hr, 31.8 tons OC/hr (combined emissions from P021, P022, P023, P024, P025, and P026) (See Additional Special Terms and Conditions)
			3745-21-07(G)	*
P026	Solvent Dipping Operation, Book Binding Line 48 Box	Use of only non-photochemically reactive materials, compliance with the Air Toxics Policy and compliance with the terms and conditions of this permit.	3745-31-05	3.55 lbs OC/hr, 31.8 tons OC/yr (combined emissions from P021, P022, P023, P024, P025, and P026) (See Additional Special Terms and Conditions)
			3745-21-07(G)	*
P027	8.0 TPH Paper Separation Process Cyclone #5	Compliance with the terms and conditions of this permit.	3745-31-05	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030, and P031) (See Additional Special Terms and Conditions)
P028	8.0 TPH Paper Separation Process Cyclone #1	Compliance with the terms and conditions of this permit.	3745-31-05	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030, and P031) (See Additional Special Terms and Conditions)

R R Donnelley & Sons Company**PTI Application: 03-10834****Modification Issued: 2/8/2001**Facility ID: **0339030135**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P029	8.0 TPH Paper Separation Process Cyclone #2	Compliance with the terms and conditions of this permit.	3745-31-05	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030, and P031) (See Additional Special Terms and Conditions)
P030	8.0 TPH Paper Separation Process Cyclone #3	Compliance with the terms and conditions of this permit.	3745-31-05	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030, and P031) (See Additional Special Terms and Conditions)
P031	8.0 TPH Paper Separation Process Cyclone #8	Compliance with the terms and conditions of this permit.	3745-31-05	8.0 lbs PE/hr, 24.9 tons PE/yr (combined emissions from P009, P014, P027, P028, P029, P030, and P031) (See Additional Special Terms and Conditions)

*The BAT requirement of the use of only non-photochemically reactive materials in these emissions units negates the applicability of, and the limits established by, OAC Rule 3745-21-07(G)(2).

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PE	49.8
OC	31.8

RECORD(S) RETENTION AND AVAILABILITY

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

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Ohio Environmental Protection Agency Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Ohio Environmental Protection Agency Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

There are no additional applicable emission limitations and/or control requirements other than those detailed in the Air Emissions Summary.

B. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the permit to install application for emission units P021, P022, P023, P024, P025 and P026. To fulfill the best available technology requirements of OAC Rule 3745-31-05 and to ensure compliance with OAC Rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based both on the materials used and the design parameters of each emissions unit's exhaust system, as specified in the application. Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentrations to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol
TLV ($\mu\text{g}/\text{m}^3$): 980,000
Maximum Hourly Emission Rate (lbs/hr): 21.7
Predicted 1-Hour Maximum Ground-Level Concentration at the Fence
Line ($\mu\text{g}/\text{m}^3$): 3,279
Maximum Acceptable Ground-Level Concentration (MAGLC) ($\mu\text{g}/\text{m}^3$): 23,333

The following additional conservative assumptions were made for emissions units P021, P022, P023, P024, P025 and P026:

- a. it was assumed that all OC (isopropyl alcohol) emissions from the six emissions units are coming from one stack; and,
- b. modeling was done as if all the emissions units were installed at the same time instead of looking at the chronological installation dates of the emissions units.

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC Rule 3745-31-01. The permittee is hereby advised that the following changes to the processes may be determined to be a “modification”:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent handbook entitled “American Conference of Governmental Industrial Hygienists (ACGIH),” that the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or the use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. changes in the composition of the materials, or the use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in emission limitation(s) established by this permit or would otherwise be considered a “modification” as defined in OAC Rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
5. The maximum annual production rate for emissions units P009, P014, P027, P028, P029, P030, and P031 shall not exceed 49,800 tons of paper processed, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u>
1	5,952 tons
1-2	11,904 tons
1-3	17,856 tons
1-4	23,808 tons
1-5	29,760 tons
1-6	35,712 tons
1-7	41,644 tons
1-8	47,616 tons
1-9	49,800 tons
1-10	49,800 tons
1-11	49,800 tons
1-12	49,800 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rate.

6. The maximum annual production rate for emissions unit P015 shall not exceed 49,800 tons of paper processed, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u>
1	5,952 tons
1-2	11,904 tons
1-3	17,856 tons
1-4	23,808 tons
1-5	29,760 tons
1-6	35,712 tons
1-7	41,644 tons
1-8	47,616 tons
1-9	49,800 tons
1-10	49,800 tons
1-11	49,800 tons
1-12	49,800 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

7. The combined maximum annual isopropyl alcohol or OC input rate for emissions units P021, P022, P023, P024, P025, and P026 shall not exceed 710 gallons of isopropyl alcohol or 31.8 tons of OC, based upon a rolling, 12-month summation of the usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the input levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative OC Input Limitation</u>
1	1500 gallons (4.9 tons)
1-2	3000 gallons (9.8 tons)
1-3	4500 gallons (14.7 tons)
1-4	6000 gallons (19.6 tons)
1-5	7500 gallons (24.6 tons)
1-6	9000 gallons (29.5 tons)
1-7	9170 gallons (31.8 tons)
1-8	9170 gallons (31.8 tons)
1-9	9170 gallons (31.8 tons)
1-10	9170 gallons (31.8 tons)
1-11	9170 gallons (31.8 tons)
1-12	9170 gallons (31.8 tons)

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the usage rates.

8. The permittee shall employ only materials in emissions units P021, P022, P023, P024, P025 and P026 that are not photochemically reactive. "Photochemically reactive material" is defined in OAC Rule 3745-21-01(C)(5).

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for emissions units P021, P022, P023, P024, P025 and P026 for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
2. The permittee shall maintain monthly records of the following information for emissions units P009, P014, P027, P028, P029, P030, and P031:
- a. the production rate (amount of paper baled) each month; and,
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the production rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.

3. The permittee shall maintain monthly records of the following information for emissions unit P015:
- a. the production rate (amount of paper baled) each month; and,
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the production rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.

4. The permittee shall maintain the following monthly records for the book binding lines, emissions units P021, P022, P023, P024, P025, and P026:
- a. total isopropyl alcohol usage at the facility in the book binding lines (P021, P022, P023, P024, P025 and P026); and,
 - b. the calculated OC emission rate, in pounds/month [$a \times 6.55 \text{ lbs OC/gal}$ (or actual OC content if less)].

5. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions unit P015 and combined emissions units P009, P014, P027, P028, P029, P030, and P031 that identify all exceedances of the rolling 12-month production rate limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels. These reports are due by the date described in Condition D.2 of the Additional Special Terms and Conditions of this permit.
2. The permittee shall submit reports in the following manner for emissions units P009, P014, P015, P021, P022, P023, P024, P025, P025, P026, P027, P028, P029, P030, and P031:
 - a. reports of any required information shall be submitted to the Ohio EPA Northwest District Office; and,
 - b. except as may otherwise be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA Northwest District Office. If no deviations occurred during a calendar quarter, a quarterly report shall be submitted which states that no deviations occurred during the quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC Rule 3745-15-06).
3. The compliance status of each emissions unit shall be reported pursuant to the annual certification required by OAC Rule 3745-77-07(C)(5).
4. The actual emissions data for each emissions unit shall be reported pursuant to the fee emissions report required by OAC Rule 3745-78-02(A).

E. Testing Requirements/Compliance Methods Determination

1. Compliance Method Requirements: Compliance with the emissions limitation(s) in Section A.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation P009
8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 6.7 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

b. Emissions Limitation P014

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

c. Emissions Limitation P015

9.9 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 9.9 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

d. Emissions Limitation P021

3.55 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic record keeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

e. Emissions Limitation P022

3.55 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic record keeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

f. Emissions Limitation P023

3.55 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic record keeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

g. Emissions Limitation P024

3.55 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitations represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic record keeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

h. Emissions Limitation P025

3.91 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic record keeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

i. Emissions Limitation P026

3.55 pounds organic compounds/hour

Applicable Compliance Method

This hourly limitation represents the emissions unit's "maximum capacity" based on the maximum hourly isopropyl alcohol application rate. Although this permit does not require periodic record keeping to verify compliance with this limitation, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

j. Emissions Limitation P027

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

k. Emissions Limitation P028

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

l. Emissions Limitation P029

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

m. Emissions Limitation P030

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitations of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

n. Emissions Limitation P031

8.0 pounds particulate matter/hour

Applicable Compliance Method

The test method employed to demonstrate compliance with the emission limitation of 8.0 pounds particulate matter/hour shall be Method 5 which is located in 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual particulate matter emission rates for the unit utilizing the method specified in the PTI application.

o. Emissions Limitation P009, P014, P027, P028, P029, P030, and P031

24.9 tons particulate matter/year

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in Section C.2 of the Additional Special Terms and Conditions of this permit.

p. Emissions Limitation P015

24.9 tons particulate matter/year

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in Section C.3 of the Additional Special Terms and Conditions of this permit.

q. Emissions Limitation P021, P022, P023, P024, P025, and P026

31.8 tons/year

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in Section C.4 of the Additional Special Terms and Conditions of this permit.

F. Miscellaneous Requirements

None.