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

10/29/2013

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
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Michael Neumann
Network Polymers, Inc.
1353 Exeter Road
Akron, OH 44306

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677011002
Permit Number: P0115313
Permit Type: Initial Installation
County: Summit

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: ARAQMD

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Network Polymers, Inc.

Facility ID:	1677011002
Permit Number:	P0115313
Permit Type:	Initial Installation
Issued:	10/29/2013
Effective:	10/29/2013
Expiration:	10/29/2018

Division of Air Pollution Control
Permit-to-Install and Operate
for
Network Polymers, Inc.

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Authorization

Facility ID:	1677011002
Application Number(s):	A0048661
Permit Number:	P0115313
Permit Description:	Initial FEPTIO for an existing thermoplastic resin compounding facility consisting of four (4) extrusion lines, material handling operations and a burn-off oven.
Permit Type:	Initial Installation
Permit Fee:	$5,400.00
Issue Date:	10/29/2013
Effective Date:	10/29/2013
Expiration Date:	10/29/2018

Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Network Polymers, Inc.
1353 EXETER ROAD
Akron, OH 44306

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0115313
Permit Description: Initial FEPTIO for an existing thermoplastic resin compounding facility consisting of four (4) extrusion lines, material handling operations and a burn-off oven.

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

Emissions Unit ID:	**N001**
Company Equipment ID:	Burn-off Oven
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Extrusion Lines

Emissions Unit ID:	**P003**
Company Equipment ID:	90 mm Line
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	50 mm Extrusion Line
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	58 mm Extrusion Line
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	75 mm Extrusion Line
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Material Handling

Emissions Unit ID:	**P901**
Company Equipment ID:	Rail Car and Silo Unload
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P902**
Company Equipment ID:	Master Batch Mix and Mixing Area
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P903**
Company Equipment ID:	Loading Operations for Extrusion Lines.
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P904**
Company Equipment ID:	Feeding Areas for Extrusion Lines
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 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 emission 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 beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. N001, Burn-off Oven

Operations, Property and/or Equipment Description:

Burn-off oven used to clean residue from extrusion equipment parts.

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

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

a. None.

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

a. 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)	Particulate matter emissions 10 microns or less in diameter (PM_{10}) shall not exceed 0.10 pounds per 100 pounds of liquid, semi-solid or solid refuse and salvageable material charged. Visible PE from this emissions unit shall not exceed 5% opacity, except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.
b.	OAC rule 3745-17-07(A)(1)	The visible PE limitation required by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-09(B)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-09(C)	See b)(2)a.

(2) Additional Terms and Conditions

a. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

c) Operational Restrictions

(1) The permittee shall burn only natural gas as fuel in this emissions unit.

(2) The permittee is restricted to use this emissions unit only for cleaning the extrusion equipment parts. The cleaning of any parts not from extrusion equipment shall be in violation of this permit.

(3) Batch incinerators (fully loaded while cold and never opened until the burn cycle is complete) shall incorporate a lockout system, which will prevent the ignition of waste until the exhaust gas temperature of the secondary combustion chamber reaches 1,400°F.

(4) The secondary combustion chamber of the emissions unit shall operate so that the exhaust gas is a minimum of 1,400°F until the wastes are completely combusted and the burn-down cycle is complete.

(5) This emissions unit shall be operated, maintained, and cleaned according to the manufacturer's recommendations.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, operate and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber of each emission unit. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.

(2) The permittee shall maintain an operation/maintenance log for this emissions unit. The log, at minimum shall contain the following information:

a. the dates the emissions unit was operated;

b. the number of batches processed in the emissions units for each date the emissions unit was operated; and

c. the dates and descriptions of any additional maintenance activities performed on the emissions unit.

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 PER the following information concerning the operations of the secondary combustion chamber during the 12-month reporting period for this emissions unit:

a. each period of time (start time and date, and end time and date) when the combustion temperature within the secondary combustion chamber was below 1,400°F;

b. the actual temperature values during the excursion;

c. the cause(s) for the excursion; and

d. the corrective action(s) to prevent future excursions.

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. <u>Emission Limitation:</u>

PM_{10} emissions shall not exceed 0.10 lbs/100 lbs of material charged.

<u>Applicable Compliance Method:</u>

If required, compliance shall be demonstrated by performing an emission test in accordance with U.S. EPA Methods 1 - 5 in 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(8).

b. <u>Emission Limitations:</u>

Visible PE from the stack shall not exceed 5% opacity, except 10% for 6 minutes in any continuous 60-minute period.

<u>Applicable Compliance Method:</u>

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with U.S. EPA Method 9 in 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Extrusion Lines: P003, P004, P005, P006

EU ID	Operations, Property and/or Equipment Description
P003	90 mm extrusion line.
P004	50 mm extrusion line.
P005	58 mm extrusion line.
P006	75 mm extrusion line.

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)(2) through d)(5) and e)(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. b)(2)a., b)(2)b., c)(1), c)(2), d)(1), and e)(1).

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>For Emissions Unit P003:</u> Volatile organic compound (VOC) emissions shall not exceed 2.40 pounds per hour and 6.55 tons per year. Particulate matter emissions 10 microns or less in diameter (PM_{10}) shall not exceed 1.0 pounds per hour and 2.73 tons per year. <u>For Emissions Unit P004:</u> VOC emissions shall not exceed 0.68 pounds per hour and 1.11 tons per year.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PM_{10} shall not exceed 1.0 pounds per hour and 1.64 tons per year. <u>For Emissions Unit P005:</u> VOC emissions shall not exceed 1.05 pounds per hour and 2.20 tons per year. PM_{10} shall not exceed 1.0 pounds per hour and 2.09 tons per year. <u>For Emissions Unit P006:</u> VOC emissions shall not exceed 1.31 pounds per hour and 3.11 tons per year. PM_{10} shall not exceed 1.0 pounds per hour and 2.37 tons per year.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)a., b)(2)b ., c)(1) and c)(2).
g.	ORC 3704.03(F) OAC rule 3745-114-01	See d)(2) through d)(5) and e)(3).

(2) Additional Terms and Conditions

a. The emissions of any individual hazardous air pollutant (HAP) from emissions units P003, P004, P005 and P006, combined, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

b. The emissions of combined HAPs from emissions units P003, P004, P005 and P006, combined, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of the monthly emission rates.

c) Operational Restrictions

(1) The maximum annual operating hours for each emissions unit shall not exceed the following amounts based upon a rolling, 12-month summation of the operating hours. The emissions units have 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 hours of operation, upon issuance of this permit.

Emissions Unit	Maximum Annual Operating Hours
P003	5,460
P004	3,276
P005	4,186
P006	4,732

(2) The maximum hourly production rate for each emissions unit shall not exceed the following rates.

Emissions Unit	Hourly Production Rate (lbs/hr)
P003	3,200
P004	900
P005	1,400
P006	1,750

d) Monitoring and/or Recordkeeping Requirements

(1) In order to determine compliance with the individual HAP and combined HAPs emissions limitations above, the permittee shall collect and record the following information for each emissions unit each month:

a. the operating hours;

b. the rolling, 12-month summation of the operating hours;

c. the amount of material produced, in pounds; and

d. the average hourly production rate, in pounds per hour, calculated by dividing c. by a.

e. the emission rate of each individual HAP, calculated by multiplying the monthly production rate by the following emissions factors (as determined by a June 12, 2013 stack test):

i. styrene: 5.7×10^{-4}lb Styrene/lb material produced;

ii. ethylbenzene: 1.125 x 10^{-4}lbethylbenzene/lb material produced;

iii. acrylonitrile: 6.825 x 10^{-5}lb acrylonitrile/lb material produced;

f. the total combined HAP emissions;

g. the rolling, 12-month summation of individual HAP emissions; and

h. the rolling, 12-month summation of combined HAPs emissions;

(2) The federally enforceable permit-to-install and operate (FEPTIO) application was evaluated based on the actual materials and the design parameters of the facility's exhaust system as a single point source for all emissions units, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the maximum acceptable ground level concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. Threshold Limit Value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. Short Term Exposure Limit (STEL) or the ceiling value from the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was and shall be used to determine the MAGLC:

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (g/sec): 1.0

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 10.9

MAGLC (ug/m3): 20,238

The permittee has demonstrated that emissions of the toxic air contaminants identified above from this facility are calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(3) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, which was modeled from the initial (or last) application; and

c. physical changes to an emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If a change meets the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director (appropriate Ohio EPA District Office or local air agency) may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit application for the increased emissions.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxics modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute, ORC 3704.03(F);

c. a copy of the computer model runs that established the predicted 1-hour maximum ground level concentration, which demonstrated the emissions units to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially, and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to an emissions unit or the materials applied.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) 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 emission limitation for any individual HAP; and

ii. allexceedances of the rolling, 12-month emission limitation for combined HAPs.

iii. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit; and

iv. anyexceedance of the hourly production rate limitation.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) 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.

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

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. <u>Emission Limitations:</u>

For Emissions Unit P003:

VOC emissions shall not exceed 2.40 pounds per hour and 6.55 tons per year.

For Emissions Unit P004:

VOC emissions shall not exceed 0.68 pounds per hour and 1.11 tons per year.

For Emissions Unit P005:

VOC emissions shall not exceed 1.05 pounds per hour and 2.20 tons per year.

For Emissions Unit P006:

VOC emissions shall not exceed 1.31 pounds per hour and 3.11 tons per year.

Applicable Compliance Method:

The hourly emission limitation was determined by multiplying the maximum hourly production rate for each emissions unit by an emissions factor of 0.00075lb of VOC/lb of material produced (as determined by a June 12, 2013 stack test).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation using U.S. EPA Methods 18, 25, and/or 25A in 40 CFR Part 60.

The annual emission limitation was determined by multiplying the hourly emission limitation by the maximum annual operating hours for each emissions unit and dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be demonstrated with the annual emission limitation.

b. Emission Limitations:

Facility-wide individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period.

Facility-wide total combined HAP emissions shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

c. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the allowable opacity limitation indentified above shall be determined in accordance with OAC rule 3745-17-03(B)(1).

d. Emission Limitations:

For Emissions Unit P003:

PM_{10} shall not exceed 1.0 pounds per hour and 2.73 tons per year.

For Emissions Unit P004:

PM_{10} shall not exceed 1.0 pounds per hour and 1.64 tons per year.

For Emissions Unit P005:

PM_{10} shall not exceed 1.0 pounds per hour and 2.09 tons per year.

For Emissions Unit P006:

PM_{10} shall not exceed 1.0 pounds per hour and 2.37 tons per year.

Applicable Compliance Method:

The hourly emission limitation was determined to be the emissions factor of 1 lb PM/hr from AP402 Air Pollution Engineering Manual, EPA, May 1973, page 376.

If required, compliance with the hourly allowable PM_{10} emission limitations identified above shall be determined by performance testing in accordance with U.S. EPA Methods 201 and 202 of 40 CFR Part 51, Appendix M.

The annual emission limitations were each determined by multiplying the hourly emission limitation by the maximum annual operating hours for each emissions unit and dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be demonstrated with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Material Handling: P901, P902, P903, P904

EU ID	Operations, Property and/or Equipment Description
P901	Rail Car and Silo Unload
P902	Master Batch Mix and Mixing Area
P903	Loading operations for extrusion lines.
P904	Feeding areas for extrusion lines.

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

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

a. None.

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

a. 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)	Particulate matter emissions 10 microns or less in diameter (PM_{10}) from emissions units P007 shall not exceed 0.44 pounds per hour and 3.09 tons per year. PM_{10} from emissions units P008 shall not exceed 0.38 pounds per hour and 1.66 tons per year. PM_{10} from emissions units P009 and P010 shall not exceed 0.73 pounds per hour and 3.20 tons per year each.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-08(B).
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)a below.
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:

i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

c) Operational Restrictions

(1) The emissions from the emissions units listed above shall be vented to a dust collector when the emissions units are in operation.

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 established for the pressure drop across each dust collector is between 0.5 to 6 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each dust collector when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each dust collector on a 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 the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop 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.

This range or limit on the pressure drop across each dust collector is 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 limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled 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.

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 each dust collector 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 dust collector was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the dust collector;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” 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.

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. <u>Emission Limitations:</u>

PM_{10} from emissions units P007 shall not exceed 0.44 pounds per hour and 3.09 tons per year.

PM_{10} from emissions units P008 shall not exceed 0.38 pounds per hour and 1.66 tons per year.

PM_{10} from emissions units P009 and P010 shall not exceed 0.73 pounds per hour and 3.20 tons per year each.

<u>Applicable Compliance Method:</u>

Compliance with the hourly emission limitation was determined by multiplying the hourly production rate of each emissions unit by the estimated loss of material

through the process of 0.01 lb/lb of material processed and each dust collector's design control efficiency of 99% (1- 0.99).

If required, compliance with the hourly allowable PM_{10} emission limitations identified above shall be determined by performance testing in accordance with U.S. EPA Methods 201 and 202 of 40 CFR Part 51, Appendix M.

The annual emission limitations were each developed by multiplying the hourly emission limitation by the maximum annual operating hours for each emissions unit and dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be demonstrated with the annual emission limitation.

b. Emission Limitation:

Visible emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 in 40 CFR Part 60, Appendix A.

c. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases **or** there shall be no visible emissions from the exhaust stack.

Applicable Compliance Method:

If required, compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22 in 40 CFR Part 60, Appendix A. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

g) Miscellaneous Requirements

(1) None.