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

12/6/2013

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Plaskolite, Inc.
Facility ID: 0125040915
Permit Type: Renewal
Permit Number: P0082773

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically 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 U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Central District Office

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Plaskolite, Inc.

Facility ID:	0125040915
Permit Number:	P0082773
Permit Type:	Renewal
Issued:	12/6/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Plaskolite, Inc.

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Authorization

Facility ID:	0125040915
Facility Description:	Plastics products, n.e.c.
Application Number(s):	A0013120
Permit Number:	P0082773
Permit Description:	Title V operating permit renewal for a plastics and resin manufacturing facility including two coating operations, two bag filling operations, and three reactors.
Permit Type:	Renewal
Issue Date:	12/6/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0082772

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Plaskolite, Inc.
1770 Joyce Avenue
Columbus, OH 43219-1026

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Central District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) 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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Central District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Central District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Central District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Central District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Central District Office.

b) Except as otherwise may 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 DAPC, Central District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, 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.)

25. Records Retention RequirementsUnder State Law Only

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 for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Central District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, subpart FFFF: P013, P014, P015, P042, and P052. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Central District Office.

3. The following emissions units contained in this permit are subject to MACT Subpart DDDDD: B002 and B003. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Central District Office.

4. The Ohio EPA, Central District Office has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units R003 and R004. The permittee shall comply with the provisions of the plan (as specified in Part C – Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

5. [Authority for term: 40 CFR Part 64]

6. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description	
B002	6.27 MMBtu natural gas-fired boiler	40 CFR Part 63, Subpart DDDDD
B003	6.27 MMBtu natural gas-fired boiler	40 CFR Part 63, Subpart DDDDD
B004	208 HP diesel-fired fire pump	PBR00357
B005	900 HP diesel-fired emergency generator	PBR00358
B006	Emergency generator - 200 KW - distillate oil	PBR07598
J001	Raw Material Unloading Rack with Vapor Balance/Return System	PTI 01-3794
P016	EP - Truck Unloading to Storage Silos # 3, #4	PTI 01-2389
P017	P - Plastic Extruder/Pelletizer P-1	PTI 01-2389
P018	EP - Plastic Extruder/Pelletizer P-4	PTI 01-2389
P029	EP - Plastic Extruder #10	PTI 01-2684
P044	Plastic Extruder; 1200 lbs/hr with line 11 condensor	PTI 01-4204
P045	Line 11 Grinder with cyclone	PTI 01-4204
P046	Extruder PD; Pelletizer P-3	PTI 01-4204
P050	EP - Grinder #13	PTI 01-5192
P051	EP - Plastic Extruder #12	PTI 01-5644
P053	Extruder/Pelletizer - PE	PTI 01-5720
P054	EP - Plastic Extruder #14	PTI 01-6884

EU ID	Operations, Property and/or Equipment Description	
P056	Extrusion area clean-up operation	PTI 01-08216
P057	Assembly area clean-up operation	PTI 01-08216
T006	CP - Aboveground Storage Tank A -15,000 gallons (MMA)	PTI 01-5716
T007	CP - Aboveground Storage Tank B -15,000 gallons (MMA)	PTI 01-5716
T008	CP - Aboveground Storage Tank C -12,000 gallons (EA)	PTI 01-5716

C. Emissions Unit Terms and Conditions

1. R003, Flowcoat Line 2

Operations, Property and/or Equipment Description:

Surface coating operation #6, flowcoat Line 2 with permanent total enclosure and regenerative thermal oxidizer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d., d)(8) through d)(11), and e)(4)

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) [PTI 01-8222]	Organic compound (OC) emissions shall not exceed 12.0 pounds per hour (lbs/hr) and 52.3 tons per year (TPY). See b)(2)a, b)(2)b., and c)(1)
b.	OAC rule 3745-21-07(M)(2)	The requirements established by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
c.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) through d)(7) and e)(2).
d.	ORC 3704.03(F)	See d)(8) through d)(11) and e)(4)

(2) Additional Terms and Conditions

a. The permittee shall control OC emissions from this emissions unit through the use of a regenerative thermal oxidizer with a minimum destruction efficiency of 95%.

b. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall operate the regenerative thermal oxidizer at all times that the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the OC content of each coating, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the OC content of each cleanup material, in pounds per gallon;

g. the total number of hours the emissions unit was operated;

h. the total uncontrolled OC emission rate from all coatings and cleanup materials, in pounds [i.e., product of d)(1)b. x d)(1)c. for all coatings + product of d)(1)e. x d)(1)f. for all cleanup materials];

i. the calculated, controlled OC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled OC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

j. the average hourly controlled OC emission rate, in pounds per hour, [i.e., d)(1)i. / d)(1)g.]

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The CAM plan for monitoring the control efficiency of the thermal oxidizer controlling OC emissions from this emissions unit has been developed for the monitoring of the combustion temperature within the regenerative thermal oxidizer. The CAM performance indicator, and indicator range, for this temperature requirement is specified in d)(3) below. When the temperature is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the thermal oxidizer) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the thermal oxidizer's temperature indicator range the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. (The most recent performance test demonstrating that the emissions unit was operating in compliance was conducted on May 14, 2007, and the average operating temperature of the RTO during the performance tests was 1,516.0 degrees Fahrenheit.)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

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

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(6) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the duct static pressure at the inlet to the regenerative thermal oxidizer. The CAM performance indicator, and indicator range, for duct static pressure is specified in d)(8) below. When the duct static pressure is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the regenerative thermal oxidizer) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the duct static pressure measurement, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture system using the following procedures:

a. Install, calibrate, maintain and operate a pressure measuring device to monitor the duct static pressure at the inlet to the thermal oxidizer.

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. The permittee shall record the duct static pressure on a daily basis.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(7) The static pressure of the RTO inlet duct, upstream of the RTO fan shall be less than (more negative) or equal to -0.15 inches of water.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(8) The PTI application for this/these emissions unit(s), R003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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(s), (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. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (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/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), 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 Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 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: Isopropyl Alcohol
   TLV (mg/m3): 983,000
   Maximum Hourly Emission Rate (lbs/hr): 12
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52.05
   MAGLC (ug/m3): 23,405

The permittee, has demonstrated that emissions of Isopropyl alcohol, from emissions unit(s) R003 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (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).

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were 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 Threshold Limit Value (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, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their 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 the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director 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 he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(10) 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 toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (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 run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) 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 the emissions unit(s) or the materials applied.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(11) 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.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;

b. each period of time (start time and date, and end time and date) when the duct static pressure measurement at the inlet to the regenerative thermal oxidizer was outside of the acceptable range;

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

d. each incident of deviation described in "a" through "c" (above) where a prompt investigation was not conducted;

e. each incident of deviation described in "a" through "c" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

f. each incident of deviation described in "a" through "c" where proper records were not maintained for the investigation and/or the corrective action(s);

g. any exceedance of the allowable hourly OC emissions rate; and

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(2) and OAC rule 3745-15-03(D) and 40 CFR Part 64]

(3) The permittee shall submit annual reports that summarize the total OC emissions, in tons, from this emissions unit. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(4) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

a. the original model input;

b. the updated model input;

c. the reason for the change(s) to the input parameter(s); and

d. a summary of the results of the updated modeling, including the input changes; and

e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), and Option A, Engineering Guide #70]

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:

OC emissions shall not exceed 12.0 lbs/hr and 52.3 TPY.

Applicable Compliance Method:

Compliance with the hourly OC emissions limitation shall be based upon the records required pursuant to d)(1) and the emission testing required in f)(2) below.

Compliance with the annual OC emissions limitation shall be based upon the summation of the daily OC emission rate as calculated in d)(1) for the calendar year.

b. Emissions Limitation:

OC emissions shall be controlled through the use of a regenerative thermal oxidizer with a minimum destruction efficiency of 95%.

Applicable Compliance Method:

Compliance shall be based upon the emission testing required in f)(2) below.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit.

b. The emission testing shall be conducted to demonstrate compliance with:

i. the hourly OC emission limitation; and

ii. the 95% destruction efficiency requirement.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may

approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

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

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

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. R004, Hardcoat Line 2

Operations, Property and/or Equipment Description:

Surface coating operation #7, hardcoat line 2 with permanent total enclosure and regenerative thermal oxidizer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d., d)(8) through d)(11), and e)(4)

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) [PTI 01-8354]	Organic compound (OC) emissions shall not exceed 7.3 tons per year (TPY). See b)(2)a., b)(2)b., and c)(1)
b.	OAC rule 3745-21-07(M)(2)	The requirements established by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
c.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) through d)(7) and e)(2).
d.	ORC 3704.03(F)	See d)(8) through d)(11) and e)(4)

(2) Additional Terms and Conditions

a. The permittee shall control OC emissions from this emissions unit through the use of a regenerative thermal oxidizer with a minimum destruction efficiency of 95%.

b. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall operate the regenerative thermal oxidizer at all times that the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the OC content of each coating, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the OC content of each cleanup material, in pounds per gallon;

g. the total uncontrolled OC emission rate from all coatings and cleanup materials, in pounds [i.e., product of d)(1)b. x d)(1)c. for all coatings + product of d)(1)e. x d)(1)f. for all cleanup materials]; and

h. the calculated, controlled OC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled OC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The CAM plan for monitoring the control efficiency of the thermal oxidizer controlling OC emissions from this emissions unit has been developed for the monitoring of the combustion temperature within the regenerative thermal oxidizer. The CAM performance indicator, and indicator range, for this temperature requirement is specified in d)(3) below. When the temperature is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the thermal oxidizer) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the thermal oxidizer's temperature indicator range the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the

cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. (The most recent performance test demonstrating that the emissions unit was operating in compliance was conducted on October 27, 2006, and the average operating temperature of the RTO during the performance tests was 1,526.3 degrees Fahrenheit.)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

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

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

(6) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the duct static pressure at the inlet to the regenerative thermal oxidizer. The CAM performance indicator, and indicator range, for duct static pressure is specified in d)(8) below. When the duct static pressure is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the regenerative thermal oxidizer) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the duct static pressure measurement, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture system using the following procedures:

a. Install, calibrate, maintain and operate a pressure measuring device to monitor the duct static pressure at the inlet to the thermal oxidizer.

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. The permittee shall record the duct static pressure on a daily basis.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(7) The static pressure of the RTO inlet duct, upstream of the RTO fan shall be less than (more negative) or equal to -0.15 inches of water.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(8) The PTI application for this/these emissions unit(s), R004, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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(s), (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. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (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/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), 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 Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 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: Isopropyl Alcohol
TLV (mg/m3): 983,000
Maximum Hourly Emission Rate (lbs/hr): 8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 130.2
MAGLC (ug/m3): 23,405

The permittee, has demonstrated that emissions of Isopropyl alcohol, from emissions unit(s) R004 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (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).

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were 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 Threshold Limit Value (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, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their 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 the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director 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 he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(10) 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 toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (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 run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) 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 the emissions unit(s) or the materials applied.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

(11) 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.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;

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

c. each period of time (start time and date, and end time and date) when the duct static pressure measurement at the inlet to the regenerative thermal oxidizer was outside of the acceptable range;

d. each incident of deviation described in "a" through "c" (above) where a prompt investigation was not conducted;

e. each incident of deviation described in "a" through "c" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

f. each incident of deviation described in "a" through "c" where proper records were not maintained for the investigation and/or the corrective action(s);

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(2) and OAC rule 3745-15-03(D) and 40 CFR Part 64]

(3) The permittee shall submit annual reports that summarize the total OC emissions, in tons, from this emissions unit. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(4) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

a. the original model input;

b. the updated model input;

c. the reason for the change(s) to the input parameter(s); and

d. a summary of the results of the updated modeling, including the input changes; and

e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), and Option A, Engineering Guide #70]

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>Emissions Limitation:</u>

OC emissions shall not exceed 7.3 TPY.

<u>Applicable Compliance Method:</u>

Compliance with the annual OC emissions limitation shall be based upon the summation of the daily OC emission rate as calculated in d)(1) for the calendar year.

b. Emissions Limitation:

OC emissions shall be controlled through the use of a regenerative thermal oxidizer with a minimum destruction efficiency of 95%.

Applicable Compliance Method:

Compliance shall be based upon the emission testing required in f)(2) below.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit.

b. The emission testing shall be conducted to demonstrate compliance with:

i. the 95% destruction efficiency requirement.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

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

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

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Bag Filling: P015,P042,

EU ID	Operations, Property and/or Equipment Description
P015	CP - bag filling station #1 with odor control scrubber
P042	CP - bag filling station #2 with odor control scrubber

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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) [PTI 01-3794]	Organic compound (OC) emissions shall not exceed 7.3 tons per year (TPY). See b)(2)a. through b)(2)f. and c)(1)
b.	OAC rule 3745-21-07(M)(2)	This emissions unit shall be equipped with a control system that reduces OC emissions by an overall control efficiency of at least 85%, by weight.
c.	40 CFR Part 63, subpart FFFF	See b)(2)f. and b)(2)g.
d.	40 CFR Part 63, subpart A	See b)(2)h.

(2) Additional Terms and Conditions

a. For the purposes of these terms and conditions, a "process unit" shall be defined as the Methylmethacrylate (MMA) and Ethyl Acrylate (EA) unloading system, the MMA and EA storage tank system, and all vents from the reactors that can exhaust directly to the outside atmosphere.

b. For the purposes of these terms and conditions, a "light liquid" means a liquid in which one or more of the pure components within the process fluid has a vapor pressure greater than 0.04 pound per square inch at sixty-eight degrees Fahrenheit and in which these components are equal to or greater than twenty percent, by weight, of the liquid.

c. For the purposes of these terms and conditions, a "heavy liquid" means a liquid in which the total concentration of the pure components having a vapor pressure greater than 0.04 pound per square inch at sixty-eight degrees Fahrenheit is less than twenty percent, by weight.

d. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 0.5 inch of water at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 0.5 gallon per minute at all times while the emissions unit is in operation.

e. For the purposes of these terms and conditions, all other definitions can be found in OAC rule 3745-21-01.

f. Emissions units P015 and P042 have been assigned leak detection and repair (LDAR) requirements as best available technology (BAT) pursuant to OAC rule 3745-31-05(A)(3). Additionally, these emissions units are subject to 40 CFR Part 63, subpart FFFF and subpart H, by reference. These regulations require the permittee to prepare and implement a LDAR program. In the event that the permittee is subject to overlapping requirements under these regulations, a single LDAR program may be developed and implemented for the purpose of demonstrating compliance with all of these regulations, provided that the more stringent requirement is met.

g. The permittee shall demonstrate compliance with the applicable requirements established pursuant to 40 CFR Part 63, subpart FFFF.

h. Table 12 of 40 CFR Part 63, subpart FFFF identifies which parts of the General Provisions (subpart A) apply.

c) Operational Restrictions

(1) The control equipment shall be operated at all times when emissions may be vented to it.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) Except during pressure releases, the pressure relief device shall be operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(3) No later than five calendar days after a pressure release, the pressure relief device shall be tested to confirm the condition of no detectable emissions in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(4) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as soon as practicable, but no later than five calendar days after the pressure release, except for a delay of repair as provided in d)(2) through d)(5).

[Authority for term: OAC rule 3745-77-07(A)(1)]

(5) Except during operations requiring the flow of process fluid through the open-ended valve or line, the cap, blind flange, plug, or second valve shall seal the open end of the open-ended valve or line.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(6) If equipped with a second valve, the open-ended valve or line shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(7) If a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves, but shall comply with c)(6) at all other times.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(8) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, subpart FFFF and subpart A.

[Authority for term: 40 CFR Part 63, subpart FFFF and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) A leak detection and repair program for equipment in the process unit shall be developed and implemented in accordance with the following requirements:

a. Except as otherwise provided in d)(1)b., equipment shall be monitored for leaks in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code, as follows:

b. Any pump in light liquid service shall be monitored monthly, except that quarterly monitoring may be employed any time after no leaks are detected during two consecutive months. The quarterly monitoring shall begin with the next calendar quarter following the two consecutive months of no detected leaks and shall be conducted in the first month of each calendar quarter. The quarterly monitoring may continue until a leak is detected, at which time monthly monitoring shall be employed again.

c. Any valve in gas/vapor service or in light liquid service shall be monitored monthly, except that quarterly monitoring may be employed any time after no leaks are detected during two consecutive months. The quarterly monitoring shall begin with the next calendar quarter following the two consecutive months of no

detected leaks and shall be conducted in the first month of each calendar quarter. The quarterly monitoring may continue until a leak is detected, at which time monthly monitoring shall be employed again.

d. Any of the following equipment shall be monitored within five calendar days after evidence of a leak or potential leak from the equipment by visual, audible, olfactory, or other detection method:

i. any pump in heavy liquid service;

ii. any valve in heavy liquid service;

iii. any pressure relief device in light liquid service or in heavy liquid service; and

iv. any flange or other connector.

e. Any equipment in which a leak is detected as described in d)(1)h. shall be monitored within five working days after each attempt to repair, unless the permittee believes that the equipment was not successfully repaired.

f. For any valve in gas/vapor service or in light liquid service, an alternative monitoring schedule may be employed in lieu of the monitoring schedule specified in d)(1)c. as follows:

i. The valve is designated as difficult to monitor and is monitored each calendar year, provided the following conditions are met:

(a) Construction of the process unit commenced prior to May 9, 1986;

(b) The permittee demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than six feet above a support surface; and

(c) The permittee has a written plan that requires monitoring of the valve at least once per year.

ii. The valve is designated as unsafe to monitor and is monitored as frequently as practical during safe to monitor times, provided the following conditions are met:

(a) The permittee demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of monitoring on a monthly basis; and

(b) The permittee adheres to a written plan that requires monitoring of the valve as frequently as practical during safe to monitor times.

g. Any pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.

h. A leak is detected:

i. when a concentration of ten thousand ppmv or greater is measured from a potential leak interface of any equipment that is monitored for leaks using the method in paragraph (F) of rule 3745-21-10 of the Administrative Code; or

ii. when there is an indication of liquids dripping from the seal of a pump in light liquid service.

i. When a leak is detected as described in d)(1)h., the following procedures shall be followed:

i. A weatherproof and readily visible identification tag, marked with the equipment identification number, is immediately attached to the leaking equipment;

ii. A record of the leak and any attempt to repair the leak is entered into the leak repair log kept pursuant to d)(1)l.;

iii. The identification tag attached to the leaking equipment, other than a pump or valve that is monitored pursuant to d)(1)b. and d)(1)c., may be removed after the leaking equipment is repaired; and

iv. The identification tag attached to a leaking pump or valve that is monitored pursuant to d)(1)b. and d)(1)c. may be removed after the leaking pump or valve is repaired, monitored for leaks for two consecutive months as specified in d)(1)b. and d)(1)c., and found to have no detected leaks during those two consecutive months.

j. When a leak is detected as described in section d)(1)h. of these terms and conditions, the leaking equipment shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected, except for a delay of repair as provided in d)(2) through d)(5). Leaking equipment shall be deemed repaired if the maximum concentration measured pursuant to d)(1)e. is less than ten thousand ppmv.

k. When a leak is detected as described in d)(1)h., a first attempt at repair shall be made no later than five calendar days after the leak is detected; and the first attempts at repair shall include, but are not limited to, the following best practices where practicable:

i. tightening of bonnet bolts;

ii. replacement of bonnet bolts;

iii. tightening of packing gland nuts; and

iv. injection of lubricant into lubricated packing.

l. When a leak is detected as described in d)(1)h., the following information shall be recorded in a leak repair log:

i. the identification number of the leaking equipment and, for leaks based on monitoring, the identification numbers of the leak detection instrument and its operator;

ii. the basis for the detection of the leak; for example, monitoring, visual inspection, or sensor;

iii. the date on which the leak was detected and the date of each attempt to repair the leaking equipment;

iv. the methods of repair applied in each attempt to repair the leaking equipment;

v. one of the following entries within five working days after each attempt to repair the leaking equipment:

(a) "not monitored," denoting the leaking equipment was presumed to still be leaking and it was not monitored; or

(b) if the leaking equipment was monitored with a leak detection instrument, the maximum concentration that was measured as follows:

(i) the actual reading in ppmv; or

(ii) "below 10,000," denoting less than ten thousand ppmv;

(iii) "above 10,000," denoting not less than ten thousand ppmv;

vi. if the leak is not repaired within fifteen calendar days after the date on which it was detected:

(a) "repair delayed" and the reason for the delay;

(b) if repair is being delayed until the next process unit shut-down due to technical infeasibility of repair, the signature of the owner or operator whose decision it was that repair is technically infeasible without a process unit shutdown;

(c) the expected date of successful repair of the leak;

(d) the dates of process unit shutdowns that occur while the leaking equipment is unrepaired; and

(e) the dates of process unit shutdowns that occurred within the semiannual period.

m. The leak repair log shall be retained by the permittee of the process unit in a readily accessible location for a minimum of two years after the date on which the record was made.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) A delay or repair shall be allowed if the repair is technically infeasible without a process unit shutdown; however, the repair shall occur before the end of the next process unit shutdown.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) A delay of repair shall be allowed for a piece of equipment that is isolated from the process and that does not remain in VOC service (for example, isolated from the process and properly purged).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) A delay of repair for a valve shall be allowed if:

a. the owner or operator of the valve demonstrates that the emissions of purged material resulting from immediate repair is greater than the emissions likely to result from delay of repair; and

b. when repair procedures are effected, the purged material is collected and destroyed or recovered in control equipment that meets the requirements specified in b)(2)d.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) A delay of repair beyond a process unit shutdown shall be allowed for a valve if a valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies are deleted. A delay of repair beyond the next process unit shutdown shall not be allowed for that valve unless the next process unit shutdown occurs sooner than six months after the first process unit shutdown.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(6) The following information shall be recorded in a log that is kept in a readily accessible location:

a. a list of identification numbers for equipment subject to the requirements of c)(3) through c)(8) and d)(1); and

b. a list of identification numbers for pressure relief devices subject to d)(1) through d)(5).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(7) The following information pertaining to valves subject to an alternative monitoring schedule, as provided in d)(1)f., shall be recorded in a log that is kept in a readily accessible location:

a. a list of identification numbers for valves designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve;

b. a list of identification numbers for valves designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the schedule for monitoring each valve; and

c. a list of identification numbers for valves subject to the alternative monitoring schedule based on a skip period, a schedule for monitoring, and the percentage of valves leaking during each monitoring period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(8) The permittee shall monitor the control equipment to ensure that it is operated and maintained in conformance with its design.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(9) The following information pertaining to control equipment described in c)(2) shall be recorded and kept in a readily accessible location:

a. detailed schematics, design specifications, and piping and instrumentation diagrams;

b. the dates and descriptions of any changes in the design specifications;

c. periods when the control equipment was not operated as designed; and

d. dates of start-ups and shutdowns of the control equipment.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(10) The permittee shall properly install, operate and maintain equipment to monitor and record the pressure drop across the scrubber and the water flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

a. the pressure drop across the scrubber, in inches of water, on a daily basis;

b. the water flow rate, in gpm, on a daily basis; and

c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(11) The permittee shall maintain records that document the total number of hours this emissions unit was in operation during the calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(12) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart FFFF and subpart A.

[Authority for term: 40 CFR Part 63, subpart FFFF and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) Semiannual reports shall be submitted to the Director (the Ohio EPA, Central District Office) by the first day of February and August and shall include the following information for the preceding semiannual periods:

a. the process unit identification;

b. the number of pumps in light liquid service;

c. the number of valves in gas/vapor service;

d. for each month during the semiannual period:

i. the number of pumps in light liquid service for which leaks were detected as described in d)(1)h.;

ii. the number of pumps in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;

iii. the number of valves in gas/vapor service or in light liquid service for which leaks were detected as described in d)(1)h.;

iv. the number of valves in gas/vapor service or in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;

v. the facts that explain each delay of repair allowed pursuant to d)(2) through d)(5); and

vi. the dates of process unit shutdowns that occurred within the semiannual period.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

a. the static pressure drop across the scrubber; and

b. the scrubber water flow rate.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart FFFF and subpart A.

[Authority for term: 40 CFR Part 63, subpart FFFF and OAC rule 3745-77-07(C)(1)]

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>Emissions Limitation:</u>

OC emissions shall not exceed 7.3 TPY.

<u>Applicable Compliance Method:</u>

Compliance with the annual OC emissions limitation is demonstrated by the following calculation and the recordkeeping requirement established in d)(11):

(HO * Ef) / 2000; where

HO = actual hours of operation [required in d)(11)]

Ef = 0.89 pound OC per hour (The 0.89 lb OC/hr emissions factor was determined during stack testing performed on May 7, 2002. The emissions factor represents the average OC emissions at the inlet of the scrubber from both emission unit P015 and emission unit P042 during the performance tests. Tests were performed at the inlet only because the scrubber is used for odor control purposes. Additionally, the hourly OC emissions do not reflect the uncontrolled potential-to-emit for these sources because the downtime between cycles, approximately 4 hours, is not considered.)

b. Emissions Limitation:

OC emissions shall be reduced by an overall control efficiency of at least 85%, by weight.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the overall OC emission reduction requirement through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart FFFF and subpart A.

[Authority for term: 40 CFR Part 63, subpart FFFF, OAC rule 3745-77-07(A)(1), and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Reactors: P013,P014,P052,

EU ID	Operations, Property and/or Equipment Description
P013	CP - polymerization reactor A with carbon adsorbers
P014	CP - polymerization reactor B with carbon adsorbers
P052	CP - polymerization reactor C with carbon adsorbers

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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) [PTI 01-8090]	Organic compound (OC) emissions shall not exceed 7.3 tons per year (TPY). See b)(2)a. through b)(2)f. and c)(1)
b.	OAC rule 3745-21-07(M)(2)	This emissions unit shall be equipped with a control system that reduces OC emissions by an overall control efficiency of at least 85%, by weight.
c.	40 CFR Part 63, subpart FFFF	See b)(2)f. and b)(2)g.
d.	40 CFR Part 63, subpart A	See b)(2)h.

(2) Additional Terms and Conditions

a. For the purposes of these terms and conditions, a "process unit" shall be defined as the Methylmethacrylate (MMA) and Ethyl Acrylate (EA) unloading system, the MMA and EA storage tank system, and all vents from the reactors that can exhaust directly to the outside atmosphere.

b. For the purposes of these terms and conditions, a "light liquid" means a liquid in which one or more of the pure components within the process fluid has a vapor pressure greater than 0.04 pound per square inch at sixty-eight degrees Fahrenheit and in which these components are equal to or greater than twenty percent, by weight, of the liquid.

c. For the purposes of these terms and conditions, a "heavy liquid" means a liquid in which the total concentration of the pure components having a vapor pressure greater than 0.04 pound per square inch at sixty-eight degrees Fahrenheit is less than twenty percent, by weight.

d. For the purposes of these terms and conditions, all other definitions can be found in OAC rule 3745-21-01.

e. The permittee shall replace the carbon adsorber upon detection of a concentration of 25 ppm or greater at the outlet of the carbon adsorber.

f. Emissions units P013, P014, and P052 have been assigned leak detection and repair (LDAR) requirements as best available technology (BAT) pursuant to OAC rule 3745-31-05(A)(3). Additionally, these emissions units are subject to 40 CFR Part 63, subpart FFFF and subpart H, by reference. These regulations require the permittee to prepare and implement a LDAR program. In the event that the permittee is subject to overlapping requirements under these regulations, a single LDAR program may be developed and implemented for the purpose of demonstrating compliance with all of these regulations, provided that the more stringent requirement is met.

g. The permittee shall demonstrate compliance with the applicable requirements established pursuant to 40 CFR Part 63, subpart FFFF.

h. Table 12 of 40 CFR Part 63, subpart FFFF identifies which parts of the General Provisions (subpart A) apply.

c) Operational Restrictions

(1) The control equipment shall be operated at all times when emissions may be vented to it.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) Except during pressure releases, the pressure relief device shall be operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(3) No later than five calendar days after a pressure release, the pressure relief device shall be tested to confirm the condition of no detectable emissions in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(4) After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as soon as practicable, but no later than five calendar days after the pressure release, except for a delay of repair as provided in d)(2) through d)(5).

[Authority for term: OAC rule 3745-77-07(A)(1)]

(5) Except during operations requiring the flow of process fluid through the open-ended valve or line, the cap, blind flange, plug, or second valve shall seal the open end of the open-ended valve or line.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(6) If equipped with a second valve, the open-ended valve or line shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(7) If a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves, but shall comply with c)(6) at all other times.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(8) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, subpart FFFF and subpart A.

[Authority for term: 40 CFR Part 63, subpart FFFF and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) A leak detection and repair program for equipment in the process unit shall be developed and implemented in accordance with the following requirements:

a. Except as otherwise provided in d)(1)b., equipment shall be monitored for leaks in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code, as follows:

b. Any pump in light liquid service shall be monitored monthly, except that quarterly monitoring may be employed any time after no leaks are detected during two consecutive months. The quarterly monitoring shall begin with the next calendar quarter following the two consecutive months of no detected leaks and shall be conducted in the first month of each calendar quarter. The quarterly monitoring may continue until a leak is detected, at which time monthly monitoring shall be employed again.

c. Any valve in gas/vapor service or in light liquid service shall be monitored monthly, except that quarterly monitoring may be employed any time after no leaks are detected during two consecutive months. The quarterly monitoring shall begin with the next calendar quarter following the two consecutive months of no

detected leaks and shall be conducted in the first month of each calendar quarter. The quarterly monitoring may continue until a leak is detected, at which time monthly monitoring shall be employed again.

d. Any of the following equipment shall be monitored within five calendar days after evidence of a leak or potential leak from the equipment by visual, audible, olfactory, or other detection method:

i. any pump in heavy liquid service;

ii. any valve in heavy liquid service;

iii. any pressure relief device in light liquid service or in heavy liquid service; and

iv. any flange or other connector.

e. Any equipment in which a leak is detected as described in d)(1)h. shall be monitored within five working days after each attempt to repair, unless the permittee believes that the equipment was not successfully repaired.

f. For any valve in gas/vapor service or in light liquid service, an alternative monitoring schedule may be employed in lieu of the monitoring schedule specified in d)(1)c. as follows:

i. The valve is designated as difficult to monitor and is monitored each calendar year, provided the following conditions are met:

(a) Construction of the process unit commenced prior to May 9, 1986;

(b) The permittee demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than six feet above a support surface; and

(c) The permittee has a written plan that requires monitoring of the valve at least once per year.

ii. The valve is designated as unsafe to monitor and is monitored as frequently as practical during safe to monitor times, provided the following conditions are met:

(a) The permittee demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of monitoring on a monthly basis; and

(b) The permittee adheres to a written plan that requires monitoring of the valve as frequently as practical during safe to monitor times.

g. Any pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.

h. A leak is detected:

i. when a concentration of ten thousand ppmv or greater is measured from a potential leak interface of any equipment that is monitored for leaks using the method in paragraph (F) of rule 3745-21-10 of the Administrative Code; or

ii. when there is an indication of liquids dripping from the seal of a pump in light liquid service.

i. When a leak is detected as described in d)(1)h., the following procedures shall be followed:

i. A weatherproof and readily visible identification tag, marked with the equipment identification number, is immediately attached to the leaking equipment;

ii. A record of the leak and any attempt to repair the leak is entered into the leak repair log kept pursuant to d)(1)l.;

iii. The identification tag attached to the leaking equipment, other than a pump or valve that is monitored pursuant to d)(1)b. and d)(1)c., may be removed after the leaking equipment is repaired; and

iv. The identification tag attached to a leaking pump or valve that is monitored pursuant to d)(1)b. and d)(1)c. may be removed after the leaking pump or valve is repaired, monitored for leaks for two consecutive months as specified in d)(1)b. and d)(1)c., and found to have no detected leaks during those two consecutive months.

j. When a leak is detected as described in section d)(1)h. of these terms and conditions, the leaking equipment shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected, except for a delay of repair as provided in d)(2) through d)(5). Leaking equipment shall be deemed repaired if the maximum concentration measured pursuant to d)(1)e. is less than ten thousand ppmv.

k. When a leak is detected as described in d)(1)h., a first attempt at repair shall be made no later than five calendar days after the leak is detected; and the first attempts at repair shall include, but are not limited to, the following best practices where practicable:

i. tightening of bonnet bolts;

ii. replacement of bonnet bolts;

iii. tightening of packing gland nuts; and

iv. injection of lubricant into lubricated packing.

l. When a leak is detected as described in d)(1)h., the following information shall be recorded in a leak repair log:

i. the identification number of the leaking equipment and, for leaks based on monitoring, the identification numbers of the leak detection instrument and its operator;

ii. the basis for the detection of the leak; for example, monitoring, visual inspection, or sensor;

iii. the date on which the leak was detected and the date of each attempt to repair the leaking equipment;

iv. the methods of repair applied in each attempt to repair the leaking equipment;

v. one of the following entries within five working days after each attempt to repair the leaking equipment:

(a) "not monitored," denoting the leaking equipment was presumed to still be leaking and it was not monitored; or

(b) if the leaking equipment was monitored with a leak detection instrument, the maximum concentration that was measured as follows:

(i) the actual reading in ppmv; or

(ii) "below 10,000," denoting less than ten thousand ppmv;

(iii) "above 10,000," denoting not less than ten thousand ppmv;

vi. if the leak is not repaired within fifteen calendar days after the date on which it was detected:

(a) "repair delayed" and the reason for the delay;

(b) if repair is being delayed until the next process unit shut-down due to technical infeasibility of repair, the signature of the owner or operator whose decision it was that repair is technically infeasible without a process unit shutdown;

(c) the expected date of successful repair of the leak;

(d) the dates of process unit shutdowns that occur while the leaking equipment is unrepaired; and

(e) the dates of process unit shutdowns that occurred within the semiannual period.

m. The leak repair log shall be retained by the permittee of the process unit in a readily accessible location for a minimum of two years after the date on which the record was made.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) A delay or repair shall be allowed if the repair is technically infeasible without a process unit shutdown; however, the repair shall occur before the end of the next process unit shutdown.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) A delay of repair shall be allowed for a piece of equipment that is isolated from the process and that does not remain in VOC service (for example, isolated from the process and properly purged).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) A delay of repair for a valve shall be allowed if:

a. the owner or operator of the valve demonstrates that the emissions of purged material resulting from immediate repair is greater than the emissions likely to result from delay of repair; and

b. when repair procedures are effected, the purged material is collected and destroyed or recovered in control equipment that meets the requirements specified in c)(2).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) A delay of repair beyond a process unit shutdown shall be allowed for a valve if a valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies are deleted. A delay of repair beyond the next process unit shutdown shall not be allowed for that valve unless the next process unit shutdown occurs sooner than six months after the first process unit shutdown.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(6) The following information shall be recorded in a log that is kept in a readily accessible location:

a. a list of identification numbers for equipment subject to the requirements of c)(3) through c)(8) and d)(1); and

b. a list of identification numbers for pressure relief devices subject to d)(1) through d)(5).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(7) The following information pertaining to valves subject to an alternative monitoring schedule, as provided in d)(1)f., shall be recorded in a log that is kept in a readily accessible location:

a. a list of identification numbers for valves designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve;

b. a list of identification numbers for valves designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the schedule for monitoring each valve; and

c. a list of identification numbers for valves subject to the alternative monitoring schedule based on a skip period, a schedule for monitoring, and the percentage of valves leaking during each monitoring period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(8) The permittee shall monitor the control equipment to ensure that it is operated and maintained in conformance with its design.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(9) The following information pertaining to control equipment described in c)(2) shall be recorded and kept in a readily accessible location:

a. detailed schematics, design specifications, and piping and instrumentation diagrams;

b. the dates and descriptions of any changes in the design specifications;

c. periods when the control equipment was not operated as designed; and

d. dates of start-ups and shutdowns of the control equipment.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(10) The permittee shall inspect daily the carbon adsorbers and associated equipment used for control of OC emissions from this emissions unit. This inspection shall be conducted while the emissions unit is in operation and include monitoring of the outlet OC concentration using a photoionization detector or equivalent monitoring device.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(11) The permittee shall record on a daily basis the following information obtained during the above-referenced carbon adsorber inspections:

a. date and time of inspection;

b. name and signature of the person conducting the inspection;

c. identification of liquid/gas leaks;

d. outlet OC concentration, in ppm; and

e. date and time of carbon adsorber replacement.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(12) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart FFFF and subpart A.

[Authority for term: 40 CFR Part 63, subpart FFFF and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) Semiannual reports shall be submitted to the Director (the Ohio EPA, Central District Office) by the first day of February and August and shall include the following information for the preceding semiannual periods:

a. the process unit identification;

b. the number of pumps in light liquid service;

c. the number of valves in gas/vapor service;

d. for each month during the semiannual period:

i. the number of pumps in light liquid service for which leaks were detected as described in d)(1)h.;

ii. the number of pumps in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;

iii. the number of valves in gas/vapor service or in light liquid service for which leaks were detected as described in d)(1)h.;

iv. the number of valves in gas/vapor service or in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;

v. the facts that explain each delay of repair allowed pursuant to d)(2) through d)(5); and

vi. the dates of process unit shutdowns that occurred within the semiannual period.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify all instances during which the measured carbon adsorber outlet concentration was greater than 25 ppm and the carbon adsorber was not replaced.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart FFFF and subpart A.

[Authority for term: 40 CFR Part 63, subpart FFFF and OAC rule 3745-77-07(C)(1)]

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>Emissions Limitation:</u>

OC emissions shall not exceed 7.3 TPY.

<u>Applicable Compliance Method:</u>

Compliance with the annual OC emissions limitation is demonstrated by the following calculation:

PWRmax * Ef * (8760/2000); where

PWRmax = 1.5 tons/hr

Ef = 0.7 pound OC per ton [AP-42 , Fifth Edition, Volume I, Chapter 6, Table 6.6.4-1(9/91)]

b. <u>Emissions Limitation:</u>

OC emissions shall be reduced by an overall control efficiency of at least 85%, by weight.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the overall OC emission reduction requirement through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, subpart FFFF and subpart A.

[Authority for term: 40 CFR Part 63, subpart FFFF, OAC rule 3745-77-07(A)(1), and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.