



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

12/23/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

06-16-01-0029

General Electric Company, d/b/a GE Electromaterials
Dean W. Talbot
1350 S. Second St.
Coshocton, OH 43812-1979

Dear Dean W. Talbot:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

If you have any questions, please contact Southeast District Office.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 12/23/02	Effective Date: 01/13/02	Expiration Date: 12/23/07
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This document constitutes issuance of a Title V permit for Facility ID: 06-16-01-0029 to:
 General Electric Company, d/b/a GE Electromaterials
 1350 S. Second St.
 Coshocton, OH 43812-1979

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Boiler #1) B&W Boiler #1	P034 (Varnish Plant) Reactors, tanks, blenders, weigh hoppers, silos and other associated equipment.	P156 (Reactor 1 and Weigh Hopper) Weigh Hopper and Reactor #1 GETEK line
B002 (Boiler #2) B&W Boiler #2	P140 (Mica Shaker/Class) Mica shaker/classifier	P162 (Batch Dry Material Handling for Reactor No. 1) Batch Dry Material Handling for Reactor No. 1
B004 (Boiler #3) Trane Murray Boiler #3	P147 (Mix Room #1) Mixers and hold tanks	R002 (Spray Booth) Spray Booth
B006 (Hot Oil Heater) Gas fired hot oil heater	P148 (Raw Material Storage) Raw material unloading, storage, and handling equipment	T003 (Resin Hold Tanks(14)) 14 Resin and Hold Tanks. One of 14 installed.
P012 (Impregnator 1020) Impregnator 1020 with mixers/tanks	P149 (Impregnator 1033) Impregnator 1033	T012 (Gravity tanks (2) for 1040 GETEK Line) Gravity tanks (2) for 1040 GETEK Line. One of 2 installed.
P015 (Impregnator 1030) Impregnator 1030 with mix tank		
P017 (Impregnator 1032) Impregnator 1032	P154 (Impregnator 1040) Impregnator 1040	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southeast District Office
 2195 Front Street
 Logan, OH 43138
 (740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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 recordings for 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:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
 - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. 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. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six

months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) 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 deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement 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. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

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

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.

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

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

2. Scheduled Maintenance/Malfunction Reporting

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 unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. 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))

5. 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))

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. 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 permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

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

10. 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))

11. 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))

12. 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 official that, 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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 appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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 appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - i. 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.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. 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))

13. 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))

14. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate District Office of the Ohio EPA or local air agency 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))

15. 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))

16. 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 emission 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. 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 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

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

19. 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))

20. 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))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 the appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

2. Records Retention Requirements

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.

3. 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.

4. Scheduled Maintenance/Malfunction Reporting

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 appropriate Ohio EPA District Office or local air agency 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).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. The Ohio EPA has determined that the requirements specified by the regulations identified in the following list are not applicable, as the facility existed on the date of issuance of this permit.

List of Negative Declarations - State and Federal Non-applicable Requirements

Emissions Units	Requirement
facility-wide	40 CFR Part 68
facility-wide	40 CFR Part 60, Subpart Db
facility-wide	40 CFR Part 60, Subpart Dc
facility-wide	40 CFR Part 60, Subpart Kb
facility-wide	40 CFR Part 60, Subpart VV
facility-wide	40 CFR Part 60, Subpart DDD
facility-wide	40 CFR Part 60, Subpart NNN
facility-wide	40 CFR Part 60, Subpart OOO
facility-wide	40 CFR Part 60, Subpart RRR
facility-wide	40 CFR Part 60, Subpart UUU
facility-wide	OAC rule 3745-17-08(B)
facility-wide	40 CFR Part 72
facility-wide	40 CFR Part 82, Subpart B
all except B004, B006, and P149	OAC rule 3745-21-08
all except B004, B006, and P149	OAC rule 3745-23-06
all except R002	OAC rule 3745-21-09
P012, P015, P017, P034, P147, and P149	40 CFR Part 60, Subpart VVV
P012, P015, P017, and P034	OAC rule 3745-21-07
P154	OAC rule 3745-31-28

2. The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers & Process Heaters, Organic Liquids Distribution (non-gasoline), Miscellaneous Organic Chemical Manufacturing, Miscellaneous Coating Manufacturing, Fabric printing, Coating & Dyeing, Paper & Other Web Coating, Miscellaneous Metal Parts and Products (surface coating), 40 CFR Part 63, Subparts DDDDD, EEEE, FFFF, HHHHH, OOOO, JJJJ, and MMMM, respectively. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts. The deadline to submit the Part I application, as specified in 40 CFR Part 63.53, was May 15, 2002. The permittee has complied with this requirement and has submitted the Part I application before the deadline of May 15, 2002.

A. State and Federally Enforcable Section (continued)

3. If the final NESHAP standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard or by May 15, 2003, whichever is later. It must contain the following information, in accordance to 40 CFR Part 63.53(b) unless otherwise provided by future U.S. EPA regulations:
- a. for a new affected source, the anticipated date of startup of operation;
 - b. the hazardous air pollutants (HAPs) emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
 - c. any existing federal, State, or local limitations or requirements applicable to the affected source;
 - d. for each affected emission point or group of affected emission points, an identification of control technology in place;
 - e. information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and
 - f. any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR Part 63.

The Part II application for a MACT determination may, but is not required to, contain the following information:

- a. recommended emission limitations for the affected source and support information. (the permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation);
 - b. a description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied; and
 - c. relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
4. If the NESHAP is promulgated before the Part II application is due for the relevant source category, the permittee may be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. If subject, the permittee shall submit the following notifications:
- a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart, to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):
 - i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the source's compliance date;
 - iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and
 - v. a statement confirming the facility is a major source for HAPs.

A. State and Federally Enforcable Section (continued)

b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

5. The permittee is subject to the Benzene Waste Operations NESHAP (40 CFR Part 61, Subpart FF) because the permittee owns and operates a "chemical manufacturing plant" as defined in 40 CFR 61.341. The chemical manufacturing plant does not manufacture benzene, but does use a raw material in its manufacturing operations that contains benzene as a contaminant. The chemical manufacturing plant's Total Annual Benzene (TAB) quantity is less than 1 Megagram/year (Mg/yr). Pursuant to 40 CFR 61.355(a)(5), the permittee shall:

a. Comply with the following record keeping requirements specified in 40 CFR 61.356(a) and (b)(1):

i. Maintain records of the quantity of each raw material received, by shipment, that is known to contain benzene

ii. Maintain records of the benzene concentration in each shipment of each such raw material (either by (1) analyzing, using an EPA-approved method, a representative sample of each shipment, or (2) using a supplier's analysis for the shipment, or (3) using the contractual specification of the maximum benzene level allowed in the raw material).

iii. Calculate the total benzene received in a calendar year in all such raw materials to demonstrate that this total is less than 1 Mg and maintain a record of this calculation.

iv. Each record shall be maintained in a readily accessible location at the facility site for a period not less than 2 years from the date the information is recorded unless otherwise specified.

b. Submit to the Ohio EPA, Southeast District Office, in accordance with 40 CFR 61.357(b), a report that updates the information listed in paragraphs (a)(1) through (a)(3) of 40 CFR 61.357 whenever there is a change in the process generating the waste stream that could cause the TAB quantity from facility waste to increase to 1 Mg/yr or more.

c. Repeat the determination of TAB quantity from facility waste, in accordance with 40 CFR 61.355(a)(5)(ii), whenever there is a change in the process generating the waste that could cause the TAB quantity from facility waste to increase to 1 Mg/yr or more.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

P018 - mica drier;
P088 - mica firing furnaces;
P095 - QA test lab;
P141 - regen. dehumidifier;
T001 - 500,000-gallon fuel tank;
T002 - storage tank #8;
Z001 - storage tank #7;
Z002 - storage tank #9;
Z003 - storage tank #10;
Z004 - storage tank #11;
Z005 - storage tank #12;
Z006 - storage tank #14;
Z007 - emergency generator;
Z008 - collating machines;
Z010 - 2003 press;
Z011 - pumice debagger;
Z012 - part cleaners;
Z026 - fab line #6 area;
Z028 - rework area;
Z029 - bonding sheet area;
Z030 - radial saw;
Z032 - 2009 press;
Z049 - Q.C. etcher;
Z050 - 1020 edge trimmer;
Z051 - 1030 edge trimmer;
Z052 - 1032 edge trimmer;
Z053 - 1033 edge trimmer;
Z054 - 1040 edge trimmer; and
Z055 - 1041 edge trimmer.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #1 (B001)

Activity Description: B&W Boiler #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Babcock and Wilcox model FF16 natural gas and fuel oil-fired boiler (boiler no. 8051) having a maximum heat input capacity of 79 mmBtu/hr	OAC rule 3745-31-05(A)(3) (PTI 06-390)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(B)(1), OAC rule 3745-17-10(C)(1), OAC rule 3745-18-22(D)(1), OAC rule 3745-21-08(B), and OAC rule 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input when burning only natural gas and/or #2 fuel oil.
	OAC rule 3745-17-10(C)(1)	Particulate emissions shall not exceed 0.15 lb/mmBtu of actual heat input when burning #6 fuel oil.
	OAC rule 3745-18-22(D)(1)	Emissions units B001 and B002 shall not exceed a maximum of 2.2 pounds of sulfur dioxide per mmBtu of actual heat input and a combined average operating rate of 87 mmBtu/hr for any calendar day.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-21-08(B)	See A.I.2.a below.
	OAC rule 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-390.

II. Operational Restrictions

1. Each shipment of fuel oil received for burning in this emissions unit shall be of sufficient quality to allow the permittee to maintain compliance with the sulfur dioxide limit of 2.2 pounds per mmBtu of actual heat input as specified above.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-390, issued on 6/5/1980: sections A.III.2 through A.III.6. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall maintain records of the fuel oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. In lieu of performing on-site sampling, representative fuel analyses performed by fuel suppliers is acceptable.

b. Alternative 2:

The permittee shall maintain a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If no additional fuel oil has been received since the most recent representative sample was taken, then another fuel oil sample is not required. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu).

3. The permittee or oil supplier shall perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Ohio EPA, Southeast District Office.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall monitor and record the following information for each calendar day during which both B001 and B002 are operated:
 - a. the total combined amount of fuel oil burned in B001 and B002 (gal);
 - b. the heat content of the fuel oil burned (Btu/gal);
 - c. the total combined amount of natural gas burned in B001 and B002 (cf);
 - d. the total combined heat input (MMBtu) for B001 and B002, calculated as follows:

$$\text{MMBtu} = [(\text{gal fuel oil}) \times (\text{Btu/gal fuel oil}) + (\text{CF of natural gas}) \times (1000 \text{ Btu/cf})] / (1,000,000 \text{ Btu/MMBtu});$$
 and
 - e. the average hourly, combined heat input (MMBtu/hr) for B001 and B002, i.e., (d)/24.
5. The permittee shall perform daily checks, using either certified or non-certified visible emissions readers, when the emissions unit is burning #6 fuel oil and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emission limitation and/or visible emission limitation. If required by the Ohio EPA Southeast District Office, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA methods and procedures. The results of any required mass emission tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

6. The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified visible emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-390, issued on 6/5/1980: sections A.IV.2 through A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit when employing alternative 1, in section A.III.2.a, and copies of the permittee's analyses of each representative grab sample of oil burned in this emissions unit when employing alternative 2, in section A.III.2.b. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment or representative grab sample of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
 - a. the total quantity of oil received in each shipment (alternative 1) or burned each day (alternative 2), in gallons; and
 - b. the calculated sulfur dioxide emission rate for each shipment or each representative grab sample of oil, in lbs/mmBtu.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each calendar day during which the combined average operating rate of 87 mmBtu/hr for emissions units B001 and B002 was exceeded.
4. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 06-390, issued on 6/5/1980: sections A.V.2.a through A.V.2.e. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2.a Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input when burning only natural gas and/or #2 fuel oil.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates when burning #2 fuel oil may be determined by dividing an emission factor of 2.0 pounds of particulates per 1000 gallons of oil combusted by the heat content of the oil, in Btu/gallon, as determined through the fuel analyses required in sections A.III.2.a or A.III.2.b and A.III.3, and multiplying the result by 1.0 million. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.3, Table 1.3-1 (9/98). If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the allowable mass emission rate for particulates when burning natural gas shall be based upon an emission factor of 0.0019 lb/mmBtu. This emission factor is specified in AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.4, Table 1.4-2 (7/98). If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

2.b Emission Limitation:

Particulate emissions shall not exceed 0.15 lb/mmBtu of actual heat input when burning #6 fuel oil.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates when burning #6 fuel oil may be determined by dividing an emission factor of 10 pounds of particulates per 1000 gallons of oil combusted by the heat content of the oil, in Btu/gallon, as determined through the fuel analyses required in sections A.III.2.a or A.III.2.b and A.III.3 of this permit, and multiplying the result by 1.0 million. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.3, Table 1.3-1 (9/98). If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

2.c Emission Limitation:

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

Applicable Compliance Method:

If required by Ohio EPA, compliance shall be determined based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2.d Emission Limitation:

Emissions units B001 and B002 shall not exceed a maximum of 2.2 pounds of sulfur dioxide per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for sulfur dioxide may be determined using the equation contained in OAC rule 3745-18-04(F)(2) and the records required pursuant to sections A.III.2.a or A.III.2.b and A.III.3.

If required by Ohio EPA, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Method 6.

2.e Emission Limitation:

Emissions units B001 and B002 shall not exceed a combined average operating rate of 87 mmBtu/hr for any calendar day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #2 (B002)
Activity Description: B&W Boiler #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Babcock and Wilcox model FF16 natural gas and fuel oil-fired boiler (boiler no. 8052) having a maximum heat input capacity of 79 mmBtu/hr	OAC rule 3745-31-05(A)(3) (PTI 06-390)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(B)(1), OAC rule 3745-17-10(C)(1), OAC rule 3745-18-22(D)(1), OAC rule 3745-21-08(B), and OAC rule 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input when burning only natural gas and/or #2 fuel oil.
	OAC rule 3745-17-10(C)(1)	Particulate emissions shall not exceed 0.15 lb/mmBtu of actual heat input when burning #6 fuel oil.
	OAC rule 3745-18-22(D)(1)	Emissions units B001 and B002 shall not exceed a maximum of 2.2 pounds of sulfur dioxide per mmBtu of actual heat input and a combined average operating rate of 87 mmBtu/hr for any calendar day.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3734-21-08(B)	See A.I.2.a below.
	OAC rule 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-390.

II. Operational Restrictions

1. Each shipment of fuel oil received for burning in this emissions unit shall be of sufficient quality to allow the permittee to maintain compliance with the sulfur dioxide limit of 2.2 pounds per mmBtu of actual heat input as specified above.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-390, issued on 6/5/1980: sections A.III.2 through A.III.6. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall maintain records of the fuel oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. In lieu of performing on-site sampling, representative fuel analyses performed by fuel suppliers is acceptable.

b. Alternative 2:

The permittee shall maintain a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If no additional fuel oil has been received since the most recent representative sample was taken, then another fuel oil sample is not required. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu).

3. The permittee or oil supplier shall perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Ohio EPA, Southeast District Office.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall monitor and record the following information for each calendar day during which both B001 and B002 are operated:

- a. the total combined amount of fuel oil burned in B001 and B002 (gal);
- b. the heat content of the fuel oil burned (Btu/gal);
- c. the total combined amount of natural gas burned in B001 and B002 (cf);
- d. the total combined heat input (MMBtu) for B001 and B002, calculated as follows:

$$\text{MMBtu} = [(\text{gal fuel oil}) \times (\text{Btu/gal fuel oil}) + (\text{CF of natural gas}) \times (1000 \text{ Btu/cf})] / (1,000,000 \text{ Btu/MMBtu}); \text{ and}$$

- e. the average hourly, combined heat input (MMBtu/hr) for B001 and B002, i.e., (d)/24.
5. The permittee shall perform daily checks, using either certified or non-certified visible emissions readers, when the emissions unit is burning #6 fuel oil and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emission limitation and/or visible emission limitation. If required by the Ohio EPA Southeast District Office, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA methods and procedures. The results of any required mass emission tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

6. The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified visible emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-390, issued on 6/5/1980: sections A.IV.2 through A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit when employing alternative 1, in section A.III.2.a, and copies of the permittee's analyses of each representative grab sample of oil burned in this emissions unit when employing alternative 2, in section A.III.2.b. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment or representative grab sample of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
 - a. the total quantity of oil received in each shipment (alternative 1) or burned each day (alternative 2), in gallons; and
 - b. the calculated sulfur dioxide emission rate for each shipment or each representative grab sample of oil, in lbs/mmBtu.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each calendar day during which the combined average operating rate of 87 mmBtu/hr for emissions units B001 and B002 was exceeded.
4. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 06-390, issued on 6/5/1980: sections A.V.2.a through A.V.2.e. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2.a Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input when burning only natural gas and/or #2 fuel oil.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates when burning #2 fuel oil may be determined by dividing an emission factor of 2.0 pounds of particulates per 1000 gallons of oil combusted by the heat content of the oil, in Btu/gallon, as determined through the fuel analyses required in sections A.III.2.a or A.III.2.b and A.III.3, and multiplying the result by 1.0 million. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.3, Table 1.3-1 (9/98). If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the allowable mass emission rate for particulates when burning natural gas shall be based upon an emission factor of 0.0019 lb/mmBtu. This emission factor is specified in AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.4, Table 1.4-2 (7/98). If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

2.b Emission Limitation:

Particulate emissions shall not exceed 0.15 lb/mmBtu of actual heat input when burning #6 fuel oil.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates when burning #6 fuel oil may be determined by dividing an emission factor of 10 pounds of particulates per 1000 gallons of oil combusted by the heat content of the oil, in Btu/gallon, as determined through the fuel analyses required in sections A.III.2.a or A.III.2.b and A.III.3 of this permit, and multiplying the result by 1.0 million. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.3, Table 1.3-1 (9/98). If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

2.c Emission Limitation:

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

Applicable Compliance Method:

If required by Ohio EPA, compliance shall be determined based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2.d Emission Limitation:

Emissions units B001 and B002 shall not exceed a maximum of 2.2 pounds of sulfur dioxide per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for sulfur dioxide may be determined using the equation contained in OAC rule 3745-18-04(F)(2) and the records required pursuant to sections A.III.2.a or A.III.2.b and A.III.3.

If required by Ohio EPA, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Method 6.

2.e Emission Limitation:

Emissions units B001 and B002 shall not exceed a combined average operating rate of 87 mmBtu/hr for any calendar day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #3 (B004)
Activity Description: Trane Murray Boiler #3

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Trane-Murray model MCF6X-67 natural gas and fuel oil-fired boiler (boiler no. 3) having a maximum heat input capacity of 116 mmBtu/hr	OAC rule 3745-31-05(A)(3) (PTI 06-390)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(B)(1), OAC rule 3745-17-10(C)(1), OAC rule 3745-18-22(D)(2), OAC rule 3745-21-08(B), and OAC rule 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input when burning only natural gas and/or #2 fuel oil.
	OAC rule 3745-17-10(C)(1)	Particulate emissions shall not exceed 0.15 lb/mmBtu of actual heat input when burning #6 fuel oil.
	OAC rule 3745-18-22(D)(2)	Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu of actual heat input.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 06-390.

II. Operational Restrictions

1. Each shipment of fuel oil received for burning in this emissions unit shall be of sufficient quality to allow the permittee to maintain compliance with the sulfur dioxide limit of 1.6 pounds per mmBtu of actual heat input as specified above.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-390, issued on 6/15/1980: sections A.III.2 through A.III.5. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. In lieu of performing on-site sampling, representative fuel analysis performed by fuel suppliers is acceptable.

b. Alternative 2:

The permittee shall maintain a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If no additional fuel oil has been received since the most recent representative sample was taken, then another fuel oil sample is not required. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu).

3. The permittee or oil supplier shall perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Ohio EPA Southeast District Office.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall perform daily checks, using either certified or non-certified visible emissions readers, when the emissions unit is burning #6 fuel oil and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emission limitation and/or visible emission limitation. If required by the Ohio EPA Southeast District Office, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA methods and procedures. The results of any required mass emission tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

5. The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified visible emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-390, issued on 6/5/1980: sections A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit when employing alternative 1, in section A.III.2.a, and copies of the permittee's analyses of each representative grab sample of oil burned in this emissions unit when employing alternative 2, in section A.III.2.b. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment or representative grab sample of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
 - a. the total quantity of oil received in each shipment (alternative 1) or burned each day (alternative 2), in gallons; and
 - b. the calculated sulfur dioxide emission rate for each shipment or each representative grab sample of oil, in lbs/mmBtu.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 06-390, issued on 6/5/1980: sections A.V.2.a through A.V.2.d. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - 2.a Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input when burning only natural gas and/or #2 fuel oil.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates when burning #2 fuel oil may be determined by dividing an emission factor of 2.0 pounds of particulates per 1000 gallons of oil combusted by the heat content of the oil, in Btu/gallon, as determined through the fuel analyses required in sections A.III.2.a or A.III.2.b and A.III.3 of this permit, and multiplying the result by 1.0 million. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.3, Table 1.3-1 (9/98). If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the allowable mass emission rate for particulates when burning natural gas shall be based upon an emission factor of 0.0019 lb/mmBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.4, Table 1.4-2 (7/98). If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

V. Testing Requirements (continued)

2.b Emission Limitation:

Particulate emissions shall not exceed 0.15 lb/mmBtu of actual heat input when burning #6 fuel oil.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates when burning #6 fuel oil may be determined by calculating an emission factor, in pounds of particulates per 1000 gallons of oil combusted, using the equation, $9.19(S) + 3.22$ from AP-42, Fifth Edition, Compilation of Air Pollutant Emission factors, Chapter 1.3, Table 1.3-1 (9/98), where S is the percent sulfur content of the fuel; dividing the result by the heat content of the oil, in Btu/gallon, and multiplying the result by 1.0 million. Both the sulfur and heat contents of the fuel shall be determined through the fuel analyses required in sections A.III.2.a or A.III.2.b and A.III.3 of this permit. If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(9).

2.c Emission Limitation:

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

Applicable Compliance Method:

If required by Ohio EPA, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2.d Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for sulfur dioxide may be determined using the equation contained in OAC rule 3745-18-04(F)(2) and the records required pursuant to sections A.III.2.a or A.III.2.b and A.III.3.

If required by Ohio EPA, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Method 6.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Hot Oil Heater (B006)
Activity Description: Gas fired hot oil heater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Fulton Thermal Corporation model FT0800C (boiler B-B) natural gas-fired hot oil heater having a maximum heat input capacity of 10.3 mmBtu/hr	OAC rule 3745-31-05(A)(3) (PTI 06-2303)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-10(B)(1), OAC rule 3745-17-07(A)(1), OAC rule 3745-18-06(A), OAC rule 3745-21-08(B), and OAC rule 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-18-06(A)	See A.I.2.a below.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- 2.b The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install PTI 06-2303.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-2303, issued on 1/19/1989: section A.III. 2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-2303, issued on 1/19/1989: section A.IV. 2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall notify the Ohio EPA Southeast District Office, in writing, of any record which shows that a fuel other than natural gas was burned in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office according to the quarterly reporting requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 06-2303, issued on 1/19/1989: sections A.V.2.a and A.V.2.b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emission Limitation:

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

Applicable Compliance Method:

If required by Ohio EPA, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2.b Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates shall be based upon an emission factor of 0.0019 lb/mmBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.4, Table 1.4-2 (7/98).

If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Impregnator 1020 (P012)
Activity Description: Impregnator 1020 with mixers/tanks

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
impregnator 1020 with mixers/tanks	none	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing source (installed in 1952) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements specified in OAC rule 3745-21-07 do not apply to this emissions unit.
- 2.b In accordance with the applicability requirements specified in 40 CFR Part 60.740(c), the requirements in Subpart VVV do not apply to this emissions unit because it was installed prior to April 30, 1987 and, as of issuance of this permit, the emissions unit has not been modified or reconstructed after April 30, 1987.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Impregnator 1030 (P015)
Activity Description: Impregnator 1030 with mix tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
impregnator 1030 with mix tank	none	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing source (installed in 1955) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements specified in OAC rule 3745-21-07 do not apply to this emissions unit.
- 2.b In accordance with the applicability requirements specified in 40 CFR Part 60.740(c), the requirements in Subpart VVV do not apply to this emissions unit because it was installed prior to April 30, 1987 and, as of issuance of this permit, the emissions unit has not been modified or reconstructed after April 30, 1987.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Impregnator 1032 (P017)

Activity Description: Impregnator 1032

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
impregnator 1032	none	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing source (installed in 1964) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements specified in OAC rule 3745-21-07 do not apply to this emissions unit.
- 2.b In accordance with the applicability requirements specified in 40 CFR Part 60.740(c), the requirements in Subpart VVV do not apply to this emissions unit because it was installed prior to April 30, 1987 and, as of issuance of this permit, the emissions unit has not been modified or reconstructed after April 30, 1987.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Varnish Plant (P034)

Activity Description: Reactors, tanks, blenders, weigh hoppers, silos and other associated equipment.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
varnish plant	none	See A.1.2.a below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing source (installed in 1946) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements specified in OAC rule 3745-21-07 do not apply to this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mica Shaker/Class (P140)

Activity Description: Mica shaker/classifier

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
mica shaker - classifier controlled with a baghouse	OAC rule 3745-17-11(B)(1)	Total particulate emissions shall not exceed 9.12 lbs/hr as determined using Table I. The allowable emissions limit based upon Figure II is less stringent.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, using either certified or non-certified visible emission readers, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emission limitation and/or visible emission limitation. If required by the Ohio EPA Southeast District Office, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA methods and procedures. The results of any required mass emission tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Total particulate emissions shall not exceed 9.12 lbs/hr as determined using Table I of OAC rule 3745-17-11. The allowable emissions limit based upon Figure II of OAC rule 3745-17-11 is less stringent.

Applicable Compliance Method:

If required by the Ohio EPA, compliance with the allowable mass emission rate for particulates shall be demonstrated by particulate emission testing of this emissions unit using Test Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-17-03(B)(10), or alternative USEPA-approved test methods may be used with prior approval from Ohio EPA.

- 1.b Emission Limitation:

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

Applicable Compliance Method:

If required by Ohio EPA, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mix Room #1 (P147)
Activity Description: Mixers and hold tanks

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
resin mixing room #1; 12 mixing and storage (holding) tanks for epoxy resin	OAC rule 3745-31-05(A)(3) (PTI 06-529)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-07(D)(2).
	OAC rule 3745-21-07(D)(2)	See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	This emissions unit is exempt from this rule pursuant to OAC rule 3745-21-07(G)(9)(a).

2. Additional Terms and Conditions

- 2.a Each mixing and storage (holding) tank employed in this emissions unit that is greater than 500 gallons capacity shall either be a pressure tank capable of maintaining working pressures sufficient at all times to prevent vapor or gas loss to the atmosphere or shall meet one of the following conditions:
 - i. shall be equipped with a permanent submerged fill pipe;
 - ii. shall be loaded through the use of a portable loading tube which can be inserted below the liquid level line during loading operations; or
 - iii. shall be fitted with a vapor recovery system as described in OAC rule 3745-21-07(D)(1)(b).
- 2.b In accordance with the applicability requirements specified in 40 CFR Part 60.740(c), the requirements in Subpart VVV do not apply to this emissions unit because it was installed prior to April 30, 1987 and, as of issuance of this permit, the emissions unit has not been modified or reconstructed after April 30, 1987.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

Facility Name: **General Electric Company, d/b/a GE Electromaterial**
Facility ID: **06-16-01-0029**
Emissions Unit: **Mix Room #1 (P147)**

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Raw Material Storage (P148)
Activity Description: Raw material unloading, storage, and handling equipment

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
raw material storage and handling system controlled with a baghouse	OAC rule 3745-31-05(A)(3) (PTI 06-505)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A)(1). See A.I.2.a below.
	OAC rule 3745-17-11(B)(1)	Total particulate emissions shall not exceed 15.8 lbs/hr as determined using Table I.
	OAC rule 3745-17-07(A)(1)	See A.I.2.b below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

- All particulate emissions from this emissions unit shall be vented to the baghouse.
- Figure II is not applicable because the uncontrolled mass rate of emission cannot be accurately or reasonably ascertained.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-505, issued on 5/4/1979: sections A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, using either certified or non-certified visible emissions readers, when this emissions unit is being loaded and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emission limitation and/or visible emission limitation. If required by the Ohio EPA Southeast District Office, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA methods and procedures. The results of any required mass emission tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

3. The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-505, issued on 5/4/1979: section A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-505, issued on 5/4/1979: sections A.V.2.a and A.V.2.b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

V. Testing Requirements (continued)

2. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emission Limitation:

Total particulate emissions shall not exceed 15.8 lbs/hr as determined using Table I of OAC rule 3745-17-11.

Applicable Compliance Method:

If required by Ohio EPA, the permittee shall demonstrate compliance by performing emission tests in accordance with U.S. EPA Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Southeast District Office.

2.b Emission Limitation:

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

Applicable Compliance Method:

If required by the Ohio EPA, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Impregnator 1033 (P149)

Activity Description: Impregnator 1033

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
impregnator 1033 - including resin applicator and substrate curing oven controlled with a thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 06-530)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3) and (G)(6)(a), OAC rule 3745-21-08(B), and OAC rule 3745-23-06(B).
	OAC rule 3745-21-07(G)(3)	The total emissions of organic compounds shall be reduced by at least 85 percent.
	OAC rule 3745-21-07(G)(6)(a)	See A.I.2.a below.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The permittee shall control organic compound emissions by the use of a thermal incinerator in which 90% or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide.
- 2.b The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 06-530.
- 2.c In accordance with the applicability requirements specified in 40 CFR Part 60.740(c), the requirements in Subpart VVV do not apply to this emissions unit because it was installed prior to April 30, 1987 and, as of issuance of this permit, the emissions unit has not been modified or reconstructed after April 30, 1987.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-530, issued on 8/9/1979: section A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in permit to install 06-530, issued on 8/9/79: section A.IV.2. The reporting requirements contained in the above-referenced permit to install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the permit to install.
2. The permittee shall notify the Ohio EPA Southeast District Office, in writing, of any record which shows any 3-hour block of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in section A.II.1 of this permit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office according to the quarterly reporting requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-530, issued on 8/9/1979: sections A.V.2 and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

2.a Emission Limitation:

The total emissions of organic compounds shall be reduced by at least 85%. The permittee shall control organic emissions by the use of a thermal incinerator in which 90% or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.3.

V. Testing Requirements (continued)

3. 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:
 - i. within 6 months of permit issuance or within 6 months following the start-up of this emissions unit after permit issuance, whichever is later; provided however, that if start-up occurs less than 6 months prior to the expiration of this permit, then no emission testing is required during this permit term; and
 - ii. between 24 and 36 months after permit issuance or between 24 and 36 months following the start-up of this emissions unit after permit issuance, whichever is later; provided however, that if start-up occurs less than 24 months prior to the expiration of this permit, then a second emission test is not required during this permit term.
 - b. The emission testing shall be conducted to demonstrate compliance with the 85% overall reduction in emissions of organic compounds and the 90% destruction efficiency of the thermal incinerator.
 - c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal incinerator: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gas.
 - d. The following methods shall be employed to demonstrate compliance with the 85% reduction in emissions of organic compounds: 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.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the test(s). The permittee may request Ohio EPA approval of additional time for the submittal of the written report.

Facility Name: **General Electric Company, d/b/a GE Electromaterial**
Facility ID: **06-16-01-0029**
Emissions Unit: **Impregnator 1033 (P149)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Impregnator 1040 (P154)

Activity Description: Impregnator 1040

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coating operation - Impregnator 1040 with oven, controlled with a total enclosure and a thermal incinerator	OAC rule 3745-31-05(A)(3) 40 CFR 52.21(j)(3) (PTI 06-5425)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV. Emissions of nitrogen oxides (NOx) shall not exceed 1.55 lbs/hr and 6.79 tpy. Emissions of carbon monoxide (CO) shall not exceed 1.30 lbs/hr and 5.70 tpy. Emissions of volatile organic compounds (VOC) shall not exceed 12.36 lbs/hr as a 3-hour average and 96.27 tpy. (The tpy limit is less stringent than as calculated from the lb/hr limit.)
	40 CFR Part 60, Subpart VVV	See A.I.2.b below.
	OAC rules 3745-21-07(G)(3), and (G)(6)(a)	See A.I.2.a below. The overall control efficiency limitation specified by these rules is less stringent than the overall control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28(B)	This emissions unit is exempt from the requirements of this rule pursuant to OAC rule 3745-31-28(C)(2).

2. Additional Terms and Conditions

- 2.a** In accordance with 40 CFR 60.742(b)(2), the permittee shall operate and maintain a total enclosure around the coating operation, including oven, and vent all the captured VOC emissions from the total enclosure to a control device during actual coating operations. The control device shall be operated and maintained such that the control device efficiency (E), determined using equation (1) specified in 40 CFR 60.743 and the test methods and procedures specified in 40 CFR 60.745(b) through (g), is equal to or greater than 0.98.
- 2.b** Total VOC emissions from the control device to which this emissions unit and any other emissions units are vented shall not exceed 23.32 lbs/hr and 102.14 tpy from the outlet of the control device.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. This emissions unit shall be totally enclosed such that all the VOC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by 40 CFR Par 60, Subpart VVV, 60.743(b)(1)(i through vi), shall be met by the permittee:
 - a. the only openings in the enclosure are forced makeup air and exhaust ducts and natural draft openings (NDO) such as those through which raw materials enter and exit the coating operation; and
 - b. the total area of all NDO's shall not exceed 5 percent of the total surface area of the total enclosure's walls, floor and ceiling; and
 - c. all access doors and windows are closed during normal operation of the enclosed coating operation, except for brief, occasional openings to accommodate process equipment adjustments. If such openings are frequent, or the access door or window remains open for a significant amount of time during the process operation, it must be considered a NDO - access doors used routinely by workers to enter and exit the enclosed area shall be equipped with automatic closures; and
 - d. the average inward face velocity (FV) across all NDOs shall be a minimum of 3,600 m/hr; and
 - e. the air passing through all NDOs flows into the enclosure continuously; and
 - f. all sources of emissions within the enclosure shall be a minimum of four equivalent diameters away from each NDO.
3. The total enclosure indicator air flow rate, as identified in the most recent version of the "Monitoring Plan For A Total Enclosure", approved by the Ohio EPA, Southeast District Office, shall be maintained at a rate of 133 feet/min, as a 3-hour average, during the operation of this emissions unit. The indicator air flow rate shall be measured within a specially constructed duct connected to the enclosure. The indicator air flow rate has been correlated to the inward face velocity at the NDOs and represents an average NDO air flow rate of 3600 meters per hour.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-5425, issued on 6/26/98, modified 10/6/1999: sections A.III.2 through A.III.6. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. As specified in 40 CFR 60.744(e), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when this emissions unit is in operation. Temperatures shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. As specified in 40 CFR 60.744(g), the permittee shall install, calibrate, maintain and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the value of the total enclosure indicator air flow rate, as identified in the version of the "Monitoring Plan For A Total Enclosure" most recently approved by the Ohio EPA, Southeast District Office.
4. The permittee shall maintain records of the total natural gas usage in the thermal oxidizer.
5. The permittee shall collect and record the following information for the control equipment for each day when this emissions unit is in operation:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance;
 - b. all 3-hour periods (during actual coating operations) during which the average total enclosure indicator air flow rate required by section A.II.2.b varies by 5 percent or more from the average value measured during the most recent emissions test that demonstrated that the emissions unit was in compliance;
 - c. all 3-hour periods during which the average total enclosure indicator air flow rate was below 133 feet/min; and
 - d. a log of the downtime for all monitoring equipment.
6. The permittee shall maintain records sufficient to document the following information for this emissions unit for each production roll:
 - a. the product grade;
 - b. the product sample weight;
 - c. the running speed in feet/minute;
 - d. pounds of resin solids applied per pound of product;
 - e. pounds of VOC per pound of resin solids applied; and
 - f. pounds VOC per pound of product.

For each month, the permittee shall calculate, as follows, and record the pounds of VOC emissions per hour for each production roll produced during the month:

pounds/square foot of product x run speed x product width (function of product grade) x pounds VOC per pound product x 60 min/hour x thermal oxidizer efficiency (as determined during the most recent performance test)

These calculations shall be completed by the 15th of the following month.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-5425, issued on 6/26/1998, modified 10/6/1999: sections A.IV.2 through A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour periods (during actual coating operations) during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average combustion temperature of the thermal incinerator during the most recent emissions test that demonstrated the emissions unit was in compliance.
3. The permittee shall submit quarterly deviation (excursion) reports which identify:
 - a. all 3-hour periods (during actual coating operations) during which the average total enclosure indicator air flow rate, specified in the most recent version of the "Monitoring Plan For A Total Enclosure", approved by the Ohio EPA, Southeast District Office, varies by 5 percent or more from the average value measured during the most recent emissions test that demonstrated that the emissions unit was in compliance.
 - b. all 3-hour periods (during actual coating operations) during which the average total enclosure indicator air flow rate was less than 133 feet/min.
4. The permittee shall submit quarterly deviation reports which include an identification of each production roll for which the controlled VOC emissions from this emissions unit exceeded 12.36 lbs/hr, and the calculated, hourly VOC emission rate.
5. As specified in 40 CFR 60.747(f), the permittee shall submit the following information with the reports specified in sections A.IV.2 and A.IV.3:
 - a. all periods during actual mixing or coating operations when a required monitoring device (if any) was malfunctioning or not operating; and
 - b. all periods during actual mixing or coating operations when the control device was malfunctioning or not operating.
6. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit and all associated emissions units for the previous calendar year. This reporting requirement may be satisfied by providing the specific emission data and calculations for this emissions unit and all associated emissions units within and/or attached to the annual Fee Emission Report to be submitted by April 15 of each year.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-5425, issued on 6/26/1998, modified 10/6/1999: sections A.V.2 and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2.a Emission Limitation:

Emissions of nitrogen oxides (NO_x) shall not exceed 1.55 lbs/hr.

Applicable Compliance Method:

Compliance may be demonstrated by the following calculation: maximum hourly natural gas usage multiplied by the AP-42 emission factor. The AP-42 emission factor used shall be 100 pounds/million SCF from table 1.4-1, dated 2/98, for uncontrolled emissions of NO_x.

If required by Ohio EPA, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

2.b Emission Limitation:

Emissions of NO_x shall not exceed 6.79 tpy.

Applicable Compliance Method:

This emission limitation was established by multiplying the allowable hourly emission rate (1.55 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

2.c Emission Limitation:

Emissions of carbon monoxide (CO) shall not exceed 1.30 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated by the following calculation: maximum hourly natural gas usage multiplied by the AP-42 emission factor. The AP-42 emission factor used shall be 84 pounds/million SCF from table 1.4-1, dated 2/98, for uncontrolled emissions of CO.

If required by Ohio EPA, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

2.d Emission Limitation:

Emissions of CO shall not exceed 5.70 tpy.

Applicable Compliance Method:

This emission limitation was established by multiplying the allowable hourly emission rate (1.30 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

V. Testing Requirements (continued)

2.e Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 12.36 lbs/hr as a 3-hour average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.6. If required by Ohio EPA, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25 or 25A.

Otherwise, compliance with this emission limitation shall be assumed if the total VOC emission limitation in section A.V.2.g is met.

2.f Emission Limitation:

Emissions of VOCs shall not exceed 96.27 tpy.

Applicable Compliance Method:

Provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be assumed.

2.g Emission Limitation:

Total VOC emissions from this emissions unit and all associated mixing equipment vented to the same control device (thermal oxidizer) shall not exceed 23.32 lbs/hr from the outlet of the control device.

Applicable Compliance Method:

Compliance shall be demonstrated by the emissions testing conducted in accordance with section A.V.3.

2.h Emission Limitation:

Total VOC emissions from this emissions unit and all associated mix equipment vented to the same control device (thermal oxidizer) shall not exceed 102.14 tpy from the outlet of the control device.

Applicable Compliance Method:

Compliance with this tpy limit shall be assumed provided that compliance is demonstrated with the hourly limit for this emissions unit and all associated mixing equipment.

2.i Emission Limitation:

The control device shall be operated and maintained such that the control device efficiency (E), determined using equation (1) specified in 40 CFR 60.743 and the test methods and procedures specified in 40 CFR 60.745(b) through (g), is equal to or greater than 0.98.

Applicable Compliance Method:

Compliance shall be determined by the emission testing conducted in accordance with section A.V.3.

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emissions testing of thermal incinerator control device in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after issuance of this permit and between 24 and 36 months after permit issuance.
 - b. The emission testing shall be conducted to demonstrate compliance with the total pound VOC/hour emissions limit from the outlet of the control device and 98 percent control efficiency.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable VOC mass emission rates: Method 25 or 25A as specified in 40 CFR 60, Subpart VVV, 60.745(b) through (g). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Southeast District Office.
 - d. The 98 percent control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR, Subpart VVV, 60.743 (b)(2). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - e. Total enclosure shall be determined using Method 204, 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 total enclosure. 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.
 - f. The tests shall be conducted while all the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

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

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

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test. The permittee may request Ohio EPA approval of additional time for the submittal of the written report.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coating operation - Impregnator 1040 including oven, controlled with a total enclosure and a thermal incinerator		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit, P154, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 46.6

Predicted 1-Hour Maximum off-site Ground-Level Concentration (ug/m3): 803

MAGLC (ug/m3): 4,476

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
3. The requirements in section B.III are superseded upon the promulgation by the USEPA of a National Emission Standard for Hazardous Air Pollutants (NESHAP) applicable to this emissions unit.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Reactor 1 and Weigh Hopper (P156)
Activity Description: Weigh Hopper and Reactor #1 GETEK line

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
reactor 1 and weigh hopper controlled with a thermal incinerator	OAC rule 3745-31-05(A)(3) 40 CFR 52.21(j)(3) (PTI 06-5425)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV. Emissions of volatile organic compounds (VOC) shall not exceed 5.04 lbs/hr and 1.10 tpy.
	40 CFR Part 60, Subpart VVV	See A.I.2.c. below.
	OAC rules 3745-21-07(D), (G)(1) and (G)(6)(a)	See A.I.2.a and A.I.2.b below. The overall control efficiency limitation specified by these rules is less stringent than the overall control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a In accordance with 40 CFR 60.742(c)(1), the permittee shall install, operate and maintain a cover on this emissions unit and vent all the captured VOC emissions from the covered equipment to the thermal incinerator while preparation of any coating is taking place within the vessel. The control device shall be operated and maintained such that the control device efficiency (E), determined using Equation (1) specified in 40 CFR 60.743 and the test methods and procedures specified in 40 CFR 60.745(b) through (g), is equal to or greater than 0.98.

2. Additional Terms and Conditions (continued)

- 2.b** i. The permittee shall employ covers that meet the following design and operating specifications:
- (a) The cover shall extend at least 2 centimeters beyond the outer rim of the opening or shall be attached to the rim.
 - (b) The cover shall be of such design and construction that contact is maintained between the cover and rim along the entire perimeter.
 - (c) Any breach in the cover (such as a slit for insertion of a mixer shaft or port for addition of ingredients) shall be covered consistent with sections A.I.2.b.i.(a), A.I.2.b.i.(b), and A.II.2 when not actively in use. An opening sufficient to allow safe clearance for a mixer shaft is acceptable during those periods when the shaft is in place.
 - (d) A polyethylene or nonpermanent cover may be used provided it meets the requirements of sections A.I.2.b.i.(a) through A.I.2.b.i.(c). Such a cover shall not be reused after once being removed.
- ii. The permittee shall demonstrate that procedures detailing the proper use of covers, as specified in section A.II.2, have been posted in all areas where affected coating mix preparation equipment are used.
- iii. The permittee shall vent the coating mix preparation equipment to the thermal incinerator while preparation of the coating is taking place within the vessel.
- 2.c** Total VOC emissions from the control device to which this emissions unit and any other emissions units are vented shall not exceed 23.32 lbs/hr and 102.14 tpy from the outlet of the control device.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. In accordance with 40 CFR 60.743(c)(1)(i), the cover(s) required in section A.I.2.a shall be closed at all times except when adding ingredients, withdrawing samples, transferring the contents, or making visual inspection when such activities cannot be carried out with cover in place. Such activities shall be carried out through ports of the minimum practical size.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-5425, issued on 6/26/1998, modified 10/6/1999: sections A.III.2 through A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. As specified in 40 CFR 60.744(e), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when this emissions unit is in operation. Temperatures shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for the control equipment for each day when this emissions unit is in operation:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance; and
 - b. a log of the downtime for all monitoring equipment.
4. The permittee shall maintain records of any time the coating mix preparation equipment is employed and the covers required in sections A.I.2.a and A.I.2.b are not closed in accordance with the requirements specified in section A.II.2.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-5425, issued on 6/26/1998, modified 10/6/1999: section A.IV. (2-5). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. As specified in 40 CFR 60.747(d)(4), the permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour periods (during actual coating operations) during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average combustion temperature of the thermal incinerator during the most recent emissions test that demonstrated the emissions unit was in compliance.
3. As specified in 40 CFR 60.747(f), the permittee shall submit the following with the reports specified in section A.IV.2:
 - a. all periods during actual mixing or coating operations when a required monitoring device (if any) was malfunctioning or not operating; and
 - b. all periods during actual mixing or coating operations when the control device was malfunctioning or not operating.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each time the coating mix preparation equipment was employed and any cover required by section A.I.2.a was not closed in accordance with the requirements specified in section A.II.2.
5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit and all associated emissions units for the previous calendar year. This reporting requirement may be satisfied by providing the specific emission data and calculations for this emissions unit and all associated emissions units within and/or attached to the annual Fee Emission Report to be submitted by April 15 of each year.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-5425, issued on 6/26/1998, modified 10/6/1999: section A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

V. Testing Requirements (continued)

2.a Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 5.04 lbs/hr.

Applicable Compliance Method:

If required by Ohio EPA, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25 or 25A.

If the total VOC allowable of 23.32 lbs/hr for all associated emissions units vented to the same control device (thermal oxidizer) is met, it will be assumed that this limit is also met. The emission testing requirement to demonstrate compliance with the total VOC allowable is specified in the terms and conditions for emissions unit P154, section A.V.3.

2.b Emission Limitation:

Emissions of VOC shall not exceed 1.10 tpy.

Applicable Compliance Method:

If the total VOC allowable of 102.14 tpy for all associated emissions units vented to the same control device (thermal oxidizer) is met, it will be assumed that this limit is also met. The emission testing requirement to demonstrate compliance with the total VOC allowable is specified in the terms and conditions for emissions unit P154, section A.V.3.

2.c Emission Limitation:

Total VOC emissions from the control device to which this emissions unit and any other emissions units are vented shall not exceed 23.32 lbs/hr and 102.14 tpy from the outlet of the control device.

Applicable Compliance Method:

Compliance with the total VOC lb/hr emission limitation shall be demonstrated by the emission testing for emissions unit P154, section A.V.3. Compliance with the total VOC tpy limitation shall be assumed provided compliance with the lb/hr limitation has been met.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
reactor 1 and weigh hopper controlled with a thermal incinerator		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit, P156, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 46.6

Predicted 1-Hour Maximum off-site Ground-Level Concentration (ug/m3): 803

MAGLC (ug/m3): 4,476

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
3. The requirements in section B.III are superseded upon the promulgation by the USEPA of a National Emission Standard for Hazardous Air Pollutants (NESHAP) applicable to this emissions unit.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Batch Dry Material Handling for Reactor No. 1 (P162)

Activity Description: Batch Dry Material Handling for Reactor No. 1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
batch dry material handling for reactor 1, controlled with a baghouse	OAC rule 3745-31-05(A)(3) (PTI 06-5891)	0.030 gr/dscf of particulate emissions or no visible particulate emissions from the stack, whichever is less stringent 3.41 tpy of particulate emissions
	OAC rule 3745-17-11(B)(1)	See A.I.2.a below. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The maximum capacity of this emissions unit is limited by its physical and operational design to 1757 tons of dry material handled per year, calculated based on 1098 batches per year and 3200 pounds of dry material handled per batch.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-5891, issued on 10/20/1999: sections A.III.2 through A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall keep the following annual records:
 - a. the total weight of all dry materials handled; and
 - b. the total number of batches.
3. The permittee shall perform daily checks, using either certified or non-certified visible emissions readers, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emission limitation and/or visible emission limitation. If required by the Ohio EPA Southeast District Office, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA methods and procedures. The results of any required mass emission tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

4. The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-5891, issued on 10/20/1999: section A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit annual reports which specify the total weight of dry materials handled and total number of batches processed in this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 of each year.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-5891, issued on 6/26/1998, modified 10/6/1999: sections A.V.2 and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 2.a Emission Limitation:

0.030 gr/dscf of particulate emissions

Applicable Compliance Method:

If required by the Ohio EPA, compliance shall be based upon the emission testing methods specified in section A.V.3.
 - 2.b Emission Limitation:

no visible particulate emissions from the stack

Applicable Compliance Method:

If required by the Ohio EPA, compliance with the no visible particulate emissions requirement shall be determined using 40 CFR Part 60, Appendix A, Method 22. (although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions)
 - 2.c Emissions Limitation:

3.41 tpy of particulate emissions

Applicable Compliance Method:

This limitation was calculated as follows:

 $0.030 \text{ gr/dscf} \times \text{lb}/7000 \text{ gr} \times 3,028 \text{ scfm (the maximum system blower capacity)} \times 60 \text{ min/hr} \times 8760 \text{ hours/year} \times 0.0005 \text{ ton/lb.}$

Therefore, provided compliance is shown with the gr/dscf limitation, compliance shall also be shown with the annual emission limitation.
3. If required by the Ohio EPA, the permittee shall conduct particulate emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted to demonstrate compliance with the 0.030 gr/dscf particulate emission limitation and the visible particulate emission limitation.
 - b. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B) and for visible particulate emissions, 40 CFR Part 60, Appendix A, Method 22. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - c. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

V. Testing Requirements (continued)

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

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

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the test and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the tests. The permittee may request Ohio EPA approval of additional time for the submittal of the written report.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth (R002)

Activity Description: Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
press pan spray booth for only miscellaneous metal parts	OAC rule 3745-31-05(A)(3) (PTI 06-4842)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-17-11(B)(1) and OAC 3745-17-07(A). 6.1 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents See A.I.2.a below.
	OAC rule 3745-21-09(U)(1)	This emissions unit is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09(U)(2)(f)(ii).
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 lb/hr as determined using Table I.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

- 2.a The emissions of VOC from all coatings and cleanup materials employed in this emissions unit shall not exceed 73 tpy, based upon a rolling, 12-month summation of the monthly emissions.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in permit to install 06-4842, issued on 09/18/1996, modified on 04/16/1997: section A.III.2. The monitoring and record keeping requirements contained in the above-referenced permit to install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the permit to install.
2. The permittee shall collect and record the following information each month for the spray booth:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in tons; and
 - h. the rolling, 12-month summation of the VOC emissions, in tons.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in permit to install 06-4842, issued on 09/18/1996, modified on 04/16/1997: sections A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced permit to install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the permit to install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
 - a. the use of each coating that exceeded 6.1 lbs of VOC per gallon, excluding water and exempt solvents; and
 - b. each rolling, 12-month summation of VOC emissions that exceeded 73 tons.

The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

3. The permittee shall submit an annual report to the Ohio EPA Southeast District Office that includes an update on available coatings less than 6.1 lbs of VOC per gallon, excluding water and exempt solvents. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-4842, issued on 9/18/1996: sections A.V.2 and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2.a Emission Limitation:

6.1 lbs of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 of this permit.

2.b Emission Limitation:

73 tpy of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 of this permit.

2.c Emission Limitation:

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

Applicable Compliance Method:

If required by Ohio EPA, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2.d Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr as determined using Table I of OAC rule 3745-17-11.

Applicable Compliance Method:

To determine the actual worst case emission rate for particulates, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate matter emission rate (lb/hr);

M = maximum coating solids usage rate (lb/hr);

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.65 for HVLP spray guns); and

CE = control efficiency of the control equipment (90% for panel filters; assume 90% for water wash unless manufacturer's data available). If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required by Ohio EPA, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

V. Testing Requirements (continued)

3. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Resin Hold Tanks(14) (T003)
Activity Description: 14 Resin and Hold Tanks. One of 14 installed.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(14) resin hold tanks controlled with a thermal incinerator	OAC rule 3745-31-05(A)(3) 40 CFR 52.21(j)(3) (PTI 06-5425)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV. Emissions of volatile organic compounds (VOC) shall not exceed 0.03 tpy.
	40 CFR Part 60, Subpart VVV	See A.I.2.c. below.
	OAC rules 3745-21-07(D)	See A.I.2.a and A.I.2.b below. The overall control efficiency limitation specified by this rule is less stringent than the overall control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a In accordance with 40 CFR 60.742(c)(1), the permittee shall install, operate and maintain a cover on this emissions unit and vent all the captured VOC emissions from the covered equipment to the thermal incinerator while preparation of any coating is taking place within the vessel. The control device shall be operated and maintained such that the control device efficiency (E), determined using Equation (1) specified in 40 CFR 60.743 and the test methods and procedures specified in 40 CFR 60.745(b) through (g), is equal to or greater than 0.98.

2. Additional Terms and Conditions (continued)

- 2.b** i. The permittee shall employ covers that meet the following design and operating specifications:
- (a) The cover shall extend at least 2 centimeters beyond the outer rim of the opening or shall be attached to the rim.
 - (b) The cover shall be of such design and construction that contact is maintained between the cover and rim along the entire perimeter.
 - (c) Any breach in the cover (such as a slit for insertion of a mixer shaft or port for addition of ingredients) shall be covered consistent with sections A.I.2.b.i.(a), A.I.2.b.i.(b), and A.II.2 when not actively in use. An opening sufficient to allow safe clearance for a mixer shaft is acceptable during those periods when the shaft is in place.
 - (d) A polyethylene or nonpermanent cover may be used provided it meets the requirements of sections A.I.2.b.i.(a) through A.I.2.b.i.(c). Such a cover shall not be reused after once being removed.
- ii. The permittee shall demonstrate that procedures detailing the proper use of covers, as specified in section A.II.2, have been posted in all areas where affected coating mix preparation equipment are used.
- iii. The permittee shall vent the coating mix preparation equipment to the thermal incinerator while preparation of the coating is taking place within the vessel.
- 2.c** Total VOC emissions from the control device to which this emissions unit and any other emissions units are vented shall not exceed 23.32 lbs/hr and 102.14 tpy from the outlet of the control device.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. In accordance with 40 CFR 60.743(c)(1)(i), the cover(s) required in section A.I.2.a shall be closed at all times except when adding ingredients, withdrawing samples, transferring the contents, or making visual inspection when such activities cannot be carried out with cover in place. Such activities shall be carried out through ports of the minimum practical size.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-5425, issued on 6/26/1998, modified 10/6/1999: sections A.III.2 through A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. As specified in 40 CFR 60.744(e), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when this emissions unit is in operation. Temperatures shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for the control equipment for each day when this emissions unit is in operation:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance; and
 - b. a log of the downtime for all monitoring equipment.
4. The permittee shall maintain records of any time the coating mix preparation equipment is employed and the covers required in sections A.I.2.a and A.I.2.b are not closed in accordance with the requirements specified in section A.II.2.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-5425, issued on 6/26/1998, modified 10/6/1999: sections A.IV.2 through A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. As specified in 40 CFR 60.747(d)(4), the permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour periods (during actual coating operations) during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average combustion temperature of the thermal incinerator during the most recent emissions test that demonstrated the emissions unit was in compliance. If no reportable periods have occurred, the permittee shall submit semiannual statements clarifying this fact.
3. As specified in 40 CFR 60.747(f), the permittee shall submit the following with the reports specified in section A.IV.1:
 - a. all periods during actual mixing or coating operations when a required monitoring device (if any) was malfunctioning or not operating; and
 - b. all periods during actual mixing or coating operations when the control device was malfunctioning or not operating.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each time the coating mix preparation equipment was employed and any cover required by section A.I.2.a was not closed in accordance with the requirements specified in section A.II.2.
5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit and all associated emissions units for the previous calendar year. This reporting requirement may be satisfied by providing the specific emission data and calculations for this emissions unit and all associated emissions units within and/or attached to the annual Fee Emission Report to be submitted by April 15 of each year.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-5425, issued on 6/26/1998, modified 10/6/1999: section A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

V. Testing Requirements (continued)

2.a Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 0.03 tpy.

Applicable Compliance Method:

If the total VOC allowable of 102.14 tpy for all associated emissions units vented to the same control device (thermal oxidizer) is met, it will be assumed that this limit is also met. The emission testing requirement to demonstrate compliance with the total VOC allowable is specified in the terms and conditions for emissions unit P154, section A.V.3.

2.b Emission Limitation:

Total VOC emissions from the control device to which this emissions unit and any other emissions units are vented shall not exceed 23.32 lbs/hr and 102.14 tpy from the outlet of the control device.

Applicable Compliance Method:

Compliance with the total VOC lb/hr emission limitation shall be demonstrated by the emission testing for emissions unit P154, section A.V.3. Compliance with the total VOC tpy limitation shall be assumed provided compliance with the lb/hr limitation has been met.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(14) resin hold tanks controlled with a thermal incinerator		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit, T003, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 46.6

Predicted 1-Hour Maximum off-site Ground-Level Concentration (ug/m3): 803

MAGLC (ug/m3): 4,476

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
3. The requirements of section B.III are superseded upon the promulgation by the USEPA of a National Emission Standard for Hazardous Air Pollutants (NESHAP) applicable to this emissions unit.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Gravity tanks (2) for 1040 GETEK Line (T012)
Activity Description: Gravity tanks (2) for 1040 GETEK Line. One of 2 installed.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(2) gravity tanks for 1040 GETEK line controlled with a thermal incinerator	OAC rule 3745-31-05(A)(3) 40 CFR 52.21(j)(3) (PTI 06-5425)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV. Emissions of volatile organic compounds (VOC) shall not exceed 0.8 tpy
	40 CFR Part 60, Subpart VVV	See A.I.2.c below.
	OAC rules 3745-21-07(D)	See A.I.2.a and A.I.2.b below. The overall control efficiency limitation specified by this rule is less stringent than the overall control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a In accordance with 40 CFR 60.742(c)(1), the permittee shall install, operate and maintain a cover on this emissions unit and vent all the captured VOC emissions from the covered equipment to the thermal incinerator while preparation of any coating is taking place within the vessel. The control device shall be operated and maintained such that the control device efficiency (E), determined using Equation (1) specified in 40 CFR 60.743 and the test methods and procedures specified in 40 CFR 60.745(b) through (g), is equal to or greater than 0.98.

2. Additional Terms and Conditions (continued)

- 2.b** i. The permittee shall employ covers that meet the following design and operating specifications:
- (a) The cover shall extend at least 2 centimeters beyond the outer rim of the opening or shall be attached to the rim.
 - (b) The cover shall be of such design and construction that contact is maintained between the cover and rim along the entire perimeter.
 - (c) Any breach in the cover (such as a slit for insertion of a mixer shaft or port for addition of ingredients) shall be covered consistent with sections A.I.2.b.i.(a), A.I.2.b.i.(b), and A.II.2 when not actively in use. An opening sufficient to allow safe clearance for a mixer shaft is acceptable during those periods when the shaft is in place.
 - (d) A polyethylene or nonpermanent cover may be used provided it meets the requirements of sections A.I.2.b.i.(a) through A.I.2.b.i.(c). Such a cover shall not be reused after once being removed.
- ii. The permittee shall demonstrate that procedures detailing the proper use of covers, as specified in section A.II.2, have been posted in all areas where affected coating mix preparation equipment are used.
- iii. The permittee shall vent the coating mix preparation equipment to the thermal incinerator while preparation of the coating is taking place within the vessel.
- 2.c** Total VOC emissions from the control device to which this emissions unit and any other emissions units are vented shall not exceed 23.32 lbs/hr and 102.14 tpy from the outlet of the control device.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. In accordance with 40 CFR 60.743(c)(1)(i), the cover(s) required in section A.I.2.a shall be closed at all times except when adding ingredients, withdrawing samples, transferring the contents, or making visual inspection when such activities cannot be carried out with cover in place. Such activities shall be carried out through ports of the minimum practical size.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-5425, issued on 6/26/1998, modified 10/6/1999: sections A.III.2 through A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. As specified in 40 CFR 60.744(e), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when this emissions unit is in operation. Temperatures shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for the control equipment for each day when this emissions unit is in operation:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance; and
 - b. a log of the downtime for all monitoring equipment.
4. The permittee shall maintain records of any time the coating mix preparation equipment is employed and the covers required in sections A.I.2.a and A.I.2.b are not closed in accordance with the requirements specified in section A.II.2.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 06-5425, issued on 6/26/1998, modified 10/6/1999: sections A.IV.2 through A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. As specified in 40 CFR 60.747(d)(4), the permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour periods (during actual coating operations) during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average combustion temperature of the thermal incinerator during the most recent emissions test that demonstrated the emissions unit was in compliance. If no reportable periods have occurred, the permittee shall submit semiannual statements clarifying this fact.
3. As specified in 40 CFR 60.747(f), the permittee shall submit the following with the reports specified in section A.IV.1:
 - a. all periods during actual mixing or coating operations when a required monitoring device (if any) was malfunctioning or not operating; and
 - b. all periods during actual mixing or coating operations when the control device was malfunctioning or not operating.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each time the coating mix preparation equipment was employed and any cover required by section A.I.2.a was not closed in accordance with the requirements specified in section A.II.2.
5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit and all associated emissions units for the previous calendar year. This reporting requirement may be satisfied by providing the specific emission data and calculations for this emissions unit and all associated emissions units within and/or attached to the annual Fee Emission Report to be submitted by April 15 of each year.

V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-5425, issued on 6/26/1998, modified 10/6/1999: section A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

V. Testing Requirements (continued)

2.a Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 0.8 tpy.

Applicable Compliance Method:

If the total VOC allowable of 102.14 tpy for all associated emissions units vented to the same control device (thermal oxidizer) is met, it will be assumed that this limit is also met. The emission testing requirement to demonstrate compliance with the total VOC allowable is specified in the terms and conditions for emissions unit P154, section A.V.3.

2.b Emission Limitation:

Total VOC emissions from the control device to which this emissions unit and any other emissions units are vented shall not exceed 23.32 lbs/hr and 102.14 tpy from the outlet of the control device.

Applicable Compliance Method:

Compliance with the total VOC lb/hr emission limitation shall be demonstrated by the emission testing for emissions unit P154, section A.V.3. Compliance with the total VOC tpy limitation shall be assumed provided compliance with the lb/hr limitation has been met.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(2) gravity tanks for 1040 GETEK line controlled with a thermal incinerator		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit, T012, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 46.6

Predicted 1-Hour Maximum off-site Ground-Level Concentration (ug/m3): 803

MAGLC (ug/m3): 4,476

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
3. The requirements of section B.III are superseded upon the promulgation by the USEPA of a National Emission Standard for Hazardous Air Pollutants (NESHAP) applicable to this emissions unit.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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