John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

6/10/2014

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Steve Bellman
H.B. Fuller Co.
4440/4450 MALSBARY RD
Blue Ash, OH 45242

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431052206
Permit Number: P0116917
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: SWOAQA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
H.B. Fuller Co.

Facility ID:	1431052206
Permit Number:	P0116917
Permit Type:	Renewal
Issued:	6/10/2014
Effective:	6/10/2014
Expiration:	6/10/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
H.B. Fuller Co.

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Authorization

Facility ID:	1431052206
Application Number(s):	A0050848
Permit Number:	P0116917
Permit Description:	Renewal FEPTIO for emission units P007 (R-5 emulsion polymerization process with thermal oxidizer) and P008 (R-6 emulsion polymerization process with thermal oxidizer).
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	6/10/2014
Effective Date:	6/10/2014
Expiration Date:	6/10/2019

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

H.B. Fuller Co.
4440/4450 MALSBARY RD
BLUE ASH, OH 45242

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

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0116917
Permit Description: Renewal FEPTIO for emission units P007 (R-5 emulsion polymerization process with thermal oxidizer) and P008 (R-6 emulsion polymerization process with thermal oxidizer).

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

Emissions Unit ID:	**P007**
Company Equipment ID:	R-5 Process
Superseded Permit Number:	P0115474
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	R-6 Process
Superseded Permit Number:	P0115474
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. “Shut down” means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

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

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

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 2., 3., 4., and 5.

2. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B001, B002, P001, P007, P008, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T014 T015, T016, T017, T018, T020, T021, other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on rolling, 12-month summations.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2:

   a) The name and identification number of each liquid material;

   b) The individual HAP content for each HAP of each liquid material;

   c) The total combined HAP content of each liquid material [sum all the individual HAP contents from b)];

   d) The number of gallons charged, processed, and/or transferred of each liquid material;

   e) The total individual HAP emissions for each HAP from all liquid materials, in pounds or tons per month, calculated using the methods outlined in Application A0047463 for FEPTIO P0114734 including HAPs displaced from the head-space of reactors and process tanks through charging (R-5 and PE-5 process points), breathing loss emissions, etc.;

   f) The total combined HAP emissions from all liquid materials, in pounds or tons per month [sum of all individual HAP emissions in e)];

   g) The updated rolling, 12-month summation of individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar month; and

   h) The updated rolling, 12-month summation of total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

4. The permittee shall notify the Southwest Ohio Air Quality Agency of any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

5. Compliance with the emission limitations in B.2. and B.3 of these terms and conditions shall be determined in accordance with the following methods:

   a) Emission Limitation:

      9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on rolling 12-month-summations for the emissions units listed in 2.

      Applicable Compliance Method:

      Compliance with the HAP emission limitations shall be demonstrated by the recordkeeping requirements specified in 3.

C. Emissions Unit Terms and Conditions

1. P007, R-5 Process

Operations, Property and/or Equipment Description:

R-5 emulsion polymerization process with thermal oxidizer emissions control device.

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

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

a. None.

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

a. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 7.36 pounds per day and 1.34 tons per year (TPY). Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 4.00 pounds per day and 0.73 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(D). See b)(2)a., c)(1) and c)(2).
b.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-08(B)	The permittee shall employ Reasonably Available Control Measures (RACM) to prevent fugitive emissions from becoming airborne. Fugitive PE shall be minimized by the use of good engineering practices.
d.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and MACT	See section B.2. and c)(1).
e.	OAC rule 3745-21-07(M)(2)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The daily and annual emission limitations outlined for OC and PE/PM10 are based on the emissions unit's potential to emit. Therefore, no daily or annual records are required to demonstrate compliance with these limitations.

c) Operational Restrictions

(1) All of the OC and HAP emissions from this emissions unit shall be vented to a thermal oxidizer, capable of maintaining a 95% overall control efficiency for OC and HAP emissions.

(2) The average temperature of the exhaust gases from the thermal oxidizer, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. 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 emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

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

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

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

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

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required

application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible emissions.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

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

ii. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation.

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September),

unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 7.36 pounds per day and 1.34 tons per year (TPY).

Applicable Compliance Methods:

If required, compliance with the daily OC emission limitation shall be demonstrated by totaling the OC emissions from the R-5 phase and PE-5 phase process points as outlined in the calculations provided in Application A0047463 for FEPTIO P0114734, in pounds OC per batch (charge), and multiplying the total by the actual number of batches (charges) during the day adding that to the total OC from any breathing loss emissions, in pounds OC per day, for a total OC emissions in pounds per day. The daily OC total shall then be multiplied by 1 minus the Control Efficiency (1 – CE%/100) of the thermal oxidizer established during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance yielding the total OC emissions in pounds per day, controlled.

The daily OC emission limitation was established based on information provided in Application A0047463 for FEPTIO P0114734 and the Application for PTI 14-04191:

36 pounds OC, R-5/batch x 2 batches/day = 72 pounds OC/day, R-5

36.4 pounds OC, PE-5/batch x 2 batches/day = 72.8 pounds OC/day, PE-5

0.13 pounds OC/hour x 18.1 hours/day = 2.35 pounds OC/day

Total 72 + 72.8 + 2.35 = 147.15 pounds OC/day, P007

147.15 pounds OC/day, P007 x (1 – 0.95 CE) = 7.36 pounds OC/day, controlled, P007

Compliance with the annual OC emission limitation shall be demonstrated by a method similar to demonstrating daily compliance, instead using the actual number of batches (charges) per year and the total OC from any breathing loss emissions, in pounds OC per year, summing the totals, and applying the control efficiency of the thermal oxidizer, and dividing by 2000 pounds yielding TPY OC.

The annual OC emission limitation was established based on information provided in Application A0047463 for FEPTIO P0114734 and the Application for PTI 14-04191:

147.15 pounds OC/day x 365 days/year x 1 Ton/2000 pounds = 26.85 TPY OC, P007

26.85 TPY OC, P007 x (1 – 0.95 CE) = 1.34 TPY OC, controlled, P007.

b. Emission Limitations:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 4.0 pounds per day and 0.73 TPY.

Applicable Compliance Methods:

If required, compliance with the daily PE/PM10 emission limitation shall be demonstrated by multiplying the actual amount of solids charged, in tons per batch, by the EF from AP-42 Table 5.10-1, Paint and Varnish Manufacturing, 5/83, 20 pounds PE/PM10 per ton of solids, multiplied by the actual number of batches (charges) during the day yielding the total PE/PM10 emissions in pounds per day.

The daily PE/PM10 emission limitation was established based on information provided in Application A0047463 for FEPTIO P0114734 and the Application for PTI 14-04191:

200 pounds solids/batch, P007 x 1 Ton/2000 pounds x 20 pounds PE/PM10/Ton solids x 2 batches/day = 4.00 pounds PE/PM10/day, P007

Compliance with the annual PE/PM10 emission limitation shall be demonstrated by a method similar to demonstrating daily compliance, instead using the actual number of batches (charges) per year and dividing by 2000 pounds yielding TPY PE/PM10.

The annual PE/PM10 emission limitation was established based on information provided in Application A0047463 for FEPTIO P0114734 and the Application for PTI 14-04191:

4 pounds PE/PM10/day, P007 x 365 days/year x 1 Ton/2000 pounds = 0.73 TPY PE/PM10, P007.

c. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

d. Control Requirement:

All of the OC and HAP emissions from this emissions unit shall be vented to a thermal oxidizer, capable of maintaining a 95% overall control efficiency for OC and HAP emissions.

Applicable Compliance Method:

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

i. The emission testing shall be conducted within 12 months after issuance and within 6 months prior to expiration of this FEPTIO;

ii. The emission testing shall be conducted to demonstrate compliance with the minimum overall control efficiency limitation for OC and HAP;

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

For OC, Method 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 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.

iv. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the

applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

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

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

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

g) Miscellaneous Requirements

(1) None.

2. P008, R-6 Process

Operations, Property and/or Equipment Description:

R-6 emulsion polymerization process with thermal oxidizer emissions control device.

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

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

a. None.

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

a. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 2.10 pounds per day and 0.38 tons per year (TPY). Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 1.50 pounds per day and 0.27 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(D). See b)(2)a., c)(1), and c)(2).
b.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-08(B)	The permittee shall employ Reasonably Available Control Measures (RACM) to prevent fugitive emissions from becoming airborne. Fugitive PE shall be minimized by the use of good engineering practices.
d.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and MACT	See section B.2. and c)(1).
e.	OAC rule 3745-21-07(M)(2)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The daily and annual emission limitations outlined for OC and PE/PM10 are based upon the emissions unit's potential to emit. Therefore, no daily or annual records are required to demonstrate compliance with these limitations.

c) Operational Restrictions

(1) All of the OC and HAP emissions from this emissions unit shall be vented to a thermal oxidizer, capable of maintaining a 95% overall control efficiency for OC and HAP emissions.

(2) The average temperature of the exhaust gases from the thermal oxidizer, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. 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 emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

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

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

b. log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

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

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

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

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

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required

application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible emissions.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

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

ii. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation.

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September),

unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Emissions of organic compounds (OC) shall not exceed 2.10 pounds per day and 0.38 tons per year (TPY).

Applicable Compliance Methods:

If required, compliance with the daily OC emission limitation shall be demonstrated by totaling the OC emissions from the R-6 phase and PE-6 phase process points as outlined in the calculations provided in Application A0047463 for FEPTIO P0114734, in pounds OC per batch (charge), and multiplying the total by the actual number of batches (charges) during the day adding that to the total OC from any breathing loss emissions, in pounds OC per day, for a total OC emissions in pounds per day. The daily OC total shall then be multiplied by 1 minus the Control Efficiency (1 – CE%/100) of the thermal oxidizer established during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance yielding the total OC emissions in pounds per day, controlled.

The daily OC emission limitation was established based on information provided in Application A0047463 for FEPTIO P0114734 and the Application for PTI 14-04191:

6.3 pounds OC, R-6/batch x 3 batches/day = 18.9 pounds OC/day, R-6

7.2 pounds OC, PE-6/batch x 3 batches/day = 21.6 pounds OC/day, PE-6

0.03 pounds OC/hour x 20.1 hours/day = 0.60 pounds OC/day

Total 18.9 + 21.6 + 0.60 = 41.1 pounds OC/day, P008

41.1 pounds OC/day, P008 x (1 – 0.95 CE) = 2.06 pounds OC/day, controlled, P008 rounded to 2.10 pounds OC/day

Compliance with the annual OC emission limitation shall be demonstrated by a method similar to demonstrating daily compliance, instead using the actual number of batches (charges) per year and the total OC from any breathing loss emissions, in pounds OC per year, summing the totals, and applying the control efficiency of the thermal oxidizer, and dividing by 2000 pounds yielding TPY OC.

The annual OC emission limitation was established based on information provided in Application A0047463 for FEPTIO P0114734 and the Application for PTI 14-04191:

41.1 pounds OC/day x 365 days/year x 1 Ton/2000 pounds = 7.50 TPY OC, P008

7.50 TPY OC, P008 x (1 – 0.95 CE) = 0.375 TPY OC, controlled, P008 rounded to 0.38 TPY OC.

b. Emission Limitations:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 1.50 pounds per day and 0.27 TPY.

Applicable Compliance Methods:

If required, compliance with the daily PE/PM10 emission limitation shall be demonstrated by multiplying the actual amount of solids charged, in tons per batch, by the EF from AP-42 Table 5.10-1, Paint and Varnish Manufacturing,

5/83, 20 pounds PE/PM10 per ton of solids, multiplied by the actual number of batches (charges) during the day yielding the total PE/PM10 emissions in pounds per day.

The daily PE/PM10 emission limitation was established based on information provided in Application A0047463 for FEPTIO P0114734 and the Application for PTI 14-04191:

50 pounds solids/batch, P008 x 1 Ton/2000 pounds x 20 pounds PE/PM10/Ton solids x 3 batches/day = 1.50 pounds PE/PM10/day, P008

Compliance with the annual PE/PM10 emission limitation shall be demonstrated by a method similar to demonstrating daily compliance, instead using the actual number of batches (charges) per year and dividing by 2000 pounds yielding TPY PE/PM10.

The annual PE/PM10 emission limitation was established based on information provided in Application A0047463 for FEPTIO P0114734 and the Application for PTI 14-04191:

1.5 pounds PE/PM10/day, P008 x 365 days/year x 1 Ton/2000 pounds = 0.27 TPY PE/PM10, P008

c. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

d. Control Requirement:

All of the OC and HAP emissions from this emissions unit shall be vented to a thermal oxidizer, capable of maintaining a 95% overall control efficiency for OC and HAP emissions

Applicable Compliance Method:

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

i. The emission testing shall be conducted within 12 months after issuance and within 6 months prior to expiration of this FEPTIO;

ii. The emission testing shall be conducted to demonstrate compliance with the minimum overall control efficiency limitation for OC and HAP;

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

For OC, Method 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 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.

iv. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the

applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

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

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

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

g) Miscellaneous Requirements

(1) None.