Facility ID: 0819070134 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0819070134 Emissions Unit ID: P034 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

A. **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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P034 - Mill System 303 including hopper and premix tank controlled with a baghouse, mill system, mill feed tank, and drum and tote filling	OAC rule 3745-31-05(A)(3) PTI 08-04669	The organic compound (OC) emissions from this emissions unit shall not exceed 3.3 pounds per hour (lbs/hr), 6.6 pounds per day (lbs/day), and 1.1 tons per year (TPY). The combined particulate emissions (PE) from the baghouse serving emissions units P032, P033, and P034 shall not exceed 0.43 lb/hr and 1.9 TPY. Visible PE from the baghouse serving emissions units P032, P033, and P034 shall not exceed 5 percent opacity, as a 6-minute average.
	OAC rule 3745-17-07(A)	The visible emissions limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05.
	OAC rule 3745-17-11(B)	The emissions limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05.
	OAC rule 3745-21- 07(G)(2)	The emissions limit specified by this rule is less stringent than that specified by OAC rule 3745-31-05.
	40 CFR Part 63 Subpart HHHHH	See term II. A.1.

2. **Additional Terms and Conditions**

   (a) The hourly PE and hourly and daily OC emissions limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
   The baghouse control is common to emissions units P032, P033 and P034.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each month for this emissions unit:

   a. The company identification for each product manufactured.

   b. The quantity of product produced, in million (MM) pounds per month.

   c. The total OC emission rate for all products produced, in tons, i.e., (b) times 153 lb OC/MM pounds product* divided by 2,000 lbs/ton)

   * The emission factor was developed by the permittee using the worst-case product.

2. The permittee shall perform weekly checks, 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. 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 abnormal 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 (iv) 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.

D. **Reporting Requirements**

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

E. **Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
3.3 lbs/hr OC

Applicable Compliance Method:
This emissions limitation is based upon the worst case product emission factor of 3.3 lbs VOC/batch and the assumption that all VOC emissions will occur during one hour of this 18-hour batch.
Emission Limitation:
6.6 lbs/day OC

Applicable Compliance Method:
This emissions limitation is based upon the worst case product emission factor of 6.6 lbs VOC/day.
Emission Limitation:
1.1 TPY OC

Applicable Compliance Method:
Compliance shall be determined by summing the monthly emissions, in tons as specified in Section C.1., for the calendar year and dividing this sum by 2000 lbs/ton.
Emission Limitation:
0.43 lb/hr PE from the baghouse serving emissions units P032, P033, and P034

Applicable Compliance Method:
This emissions limitation is based on multiplying the PE grain loading from the baghouse (0.01 gr/dscf) by the stack air flow rate (5,000 acfm), by 60 minutes/hour and dividing by 7,000 gr/lb.

If required, compliance with the PE limitation above shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(10) using Methods 1 - 5 of 40 CFR Part 60, Appendix A.
Emission Limitation:
1.9 TPY PE from the baghouse serving emissions units P032, P033, and P034

Applicable Compliance Method:
Compliance with the annual PE limitation above shall be determined by multiplying the maximum hourly PE rate (0.43 lb/hr) by the maximum operating hours (8,760 hours/yr) and dividing by 2,000 lbs/ton.
Emission Limitation:
Visible emissions shall not exceed 5% opacity, as a 6-minute average

Applicable Compliance Method-
If required, compliance with the visible emissions limitation above shall be based on visible emissions evaluations conducted in accordance with OAC rule 3745-17-03(B)(1) using Method 9 of 40 CFR Part 60, Appendix A.

F. **Miscellaneous Requirements**

1. None