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

7/28/2014

Certified Mail

Mr. Doug Catron
Midwest Express Inc.
11590 T.R. 298
East Liberty, OH 43319

Facility ID: 0546000133
Permit Number: P0116505
County: Logan

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 6/11/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Southwest District Office

Response to Comments

Facility ID:	0546000133
Facility Name:	Midwest Express Inc.
Facility Description:	Shipping and shipping prep. facility
Facility Address:	11590 T.R. 157 East Liberty, OH 43319 Logan County
Permit:	P0116505, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Bellefontaine Examiner on 06/14/2014. The comment period ended on 07/14/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Midwest Express Inc.

Facility ID:	0546000133
Permit Number:	P0116505
Permit Type:	Renewal
Issued:	7/28/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Midwest Express Inc.

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Authorization

Facility ID:	0546000133
Facility Description:	Shipping and shipping prep. facility
Application Number(s):	A0050228
Permit Number:	P0116505
Permit Description:	Renewal of Title V for shipping and shipping prep. facility related to Honda East Liberty Plant. Including ST&C's from PAL PTI.
Permit Type:	Renewal
Issue Date:	7/28/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0104116

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

Midwest Express Inc.
11590 T.R. 157
East Liberty, OH 43319

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

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

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

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

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

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

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

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

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

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

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

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms

and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

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

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

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

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

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

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

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

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

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

28. Permit Transfers

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

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

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

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

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

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

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

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

30. Submitting Documents Required by this Permit

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

B. Facility-Wide Terms and Conditions

1. **Establishment of Plantwide Applicability Limitations (PALs)**

a) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) volatile organic compound (VOC) emission limitation of 2,125.9 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide VOC emissions from 2004 and 2005 of 2,065.8 and 2,107.9 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,086.9 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.0 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,125.9 tons per year on a rolling, 12-month basis.

b) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) carbon monoxide (CO) emission limitation of 236.4 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide CO emissions from 2005 and 2006 of 138.9 and 134.0 tons, respectively. Average facility-wide CO emissions for 2005 and 2006 are 136.4 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 99.9 tons of CO, the adjusted baseline actual facility-wide CO emissions are 236.4 tons per year on a rolling, 12-month basis.

c) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) nitrogen oxides (NOx) emission limitation of 203.0 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide NOx emissions from 2005 and 2006 of 165.2 and 160.9 tons, respectively. Average facility-wide NOx emissions for 2005 and 2006 are 163.1 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of NOx, the adjusted baseline actual facility-wide NOx emissions are 203.0 tons per year on a rolling, 12-month basis.

d) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) particulate matter (PM) emission limitation of 133.1 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM emissions from 2004 and 2005 of 107.4 and 109.0 tons, respectively. Average facility-wide PM emissions for 2004 and 2005 are 108.2 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 24.9 tons of PM, the adjusted baseline actual facility-wide PM emissions are 133.1 tons per year on a rolling, 12-month basis.

e) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM_{10} emission limitation of 93.7 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM_{10} emissions from 2004 and 2005 of 78.2 and 79.4 tons, respectively. Average facility-wide PM_{10} emissions for 2004 and 2005 are 78.8 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 14.9 tons of PM_{10}, the adjusted baseline actual facility-wide PM_{10} emissions are 93.7 tons per year on a rolling, 12-month basis.

f) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) $PM_{2.5}$ emission limitation of 64.4 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is

based upon actual facility-wide $PM_{2.5}$ emissions from 2004 and 2005 of 54.2 and 54.8 tons, respectively. Average facility-wide $PM_{2.5}$ emissions for 2004 and 2005 are 54.5 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 9.9 tons of $PM_{2.5}$, the adjusted baseline actual facility-wide $PM_{2.5}$ emissions are 64.4 tons per year on a rolling, 12-month basis.

g) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) sulfur oxides (SOx) emission limitation of 42.7 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide SOx emissions from 2004 and 2005 of 2.8 and 2.9 tons, respectively. Average facility-wide SOx emissions for 2004 and 2005 are 2.8 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of SOx, the adjusted baseline actual facility-wide SOx emissions are 42.7 tons per year on a rolling, 12-month basis.

h) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) greenhouse gas (GHG) emission limitation of 264,626 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide GHG emissions from 2005 and 2006 of 191,727 and 187,528 tons, respectively. Average facility-wide GHG emissions for 2005 and 2006 are 189,628 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 74,999 tons of GHG, the adjusted baseline actual facility-wide GHG emissions are 264,626 tons per year on a rolling, 12-month basis.

2. **Plantwide Applicability Limitations (PALs)**

a) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) VOC emissions shall not exceed 2,125.9 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing VOC emissions on a rolling, 12-month basis from all emissions units that emit VOCs at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. VOC emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

b) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) CO emissions shall not exceed 236.4 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing CO emissions on a rolling, 12-month basis from all emissions units that emit CO at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. CO emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

c) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) NOx emissions shall not exceed 203.0 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing NOx emissions on a rolling, 12-month basis from all emissions units that emit NOx at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. NOx emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

d) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM emissions shall not exceed 133.1 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM emissions on a rolling, 12-month basis from all emissions units that emit PM at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

e) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM_{10} emissions shall not exceed 93.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM_{10} emissions on a rolling, 12-month basis from all emissions units that emit PM_{10} at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM_{10} emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

f) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) $PM_{2.5}$ emissions shall not exceed 64.4 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing $PM_{2.5}$ emissions on a rolling, 12-month basis from all emissions units that emit $PM_{2.5}$ at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. $PM_{2.5}$ emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

g) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) SOx emissions shall not exceed 42.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing SOx emissions on a rolling, 12-month basis from all emissions units that emit SOx at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the

emissions calculations based on either monthly usage records or worst-case potential. SOx emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

h) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) GHG emissions shall not exceed 264,626 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing GHG emissions on a rolling, 12-month basis from all emissions units that emit GHGs at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. GHG emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

3. **PAL Monitoring and Record Keeping Requirements**

a) The permittee shall maintain a copy of all records necessary to determine compliance with any requirement of OAC rule 3745-31-32(A) and of the PAL, including a determination of each emission unit's 12-month rolling total emissions, for 5 years from the date of such record.

b) The permittee shall retain a copy of the following records for the duration of the PAL effective period plus five years:

(1) a copy of the PAL permit application and any applications for revisions to the PAL; and

(2) each annual certification of compliance pursuant to Title V and the data relied on in certifying compliance.

c) The permittee shall monitor all emissions units at the combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) for VOC, $PM_{2.5}$, PM_{10}, NO_x, CO, SO_2, and GHG in accordance with OAC rule 3745-31-32(A)(11) (mass balance, CEMS, CPMS, PEMS, and/or emission factors).

d) Natural gas usage for process and building heat shall be monitored using the billing meters associated with the facility (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133). By using the billing meters, the permittee will have collected natural gas usage for significant and insignificant emission units located at the facility. Monthly VOC, PM2.5, PM10, PM, NOx, CO, SO2, and GHG emissions shall be calculated from the monthly usage records and the applicable AP-42 emission factors. These emissions shall be included in the compliance demonstrations for each applicable Plantwide Applicability Limit specified in section B.3 of this permit. The permittee shall have the option to

subtract natural gas usage associated with mobile sources from the billing records provided adequate records are maintained to substantiate the deduction.

4. **PAL Reporting Requirements**

a) The permittee shall submit semi-annual monitoring reports and prompt deviation reports to the Ohio EPA Central District Office and/or Southwest District Office based on the appropriate office and premise number of the emissions units' locations in accordance with the appropriate and applicable Title V operating permit program. The reports shall meet the following requirements [OAC rule 3745-31-32(A)(13)]:

(1) Semi-annual report:

The semi-annual report shall be submitted to the appropriate District Office within thirty days of the end of each reporting period. This report shall contain the following information:

a. The identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install.

b. Total annual emissions (tons per year) based on a twelve-month rolling total for each month in the reporting period recorded pursuant to B.4.a)(2) of these terms and conditions.

c. All data relied upon, including, but not limited to, any quality assurance or quality control data, in calculating the monthly and annual PAL pollutant emissions. It is acceptable for this data to be maintained at the facility and made available to the Ohio EPA upon request.

d. A list of any emissions units modified or added to the major stationary source during the preceding six-month period.

e. The number, duration, and cause of any deviations or monitoring malfunctions (other than the time associated with zero and span calibration checks), and any corrective action taken.

f. A notification of a shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of any pollutant or the number determined by method included in the PAL permit (OAC rule 3745-31-32(A)(11)(g)).

g. A signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(2) Deviation report:

The major stationary source owner or operator shall promptly submit reports of any deviations or exceedance of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to paragraph (A)(3)(c)(iii) of OAC rule 3745-77-07 and/or Standard Terms and Conditions items A.4.c)(1) through A.4.c)(4) of this permit shall satisfy this reporting requirement. The deviation reports shall be submitted within the time limits prescribed by OAC rule 3745-77-07 and/or Standard Terms and Conditions items A.4.c)(1) through A.4.c)(4) of this permit. The reports shall contain the following information:

a. the identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install;

b. the PAL requirement that experienced the deviation or that was exceeded;

c. emissions resulting from the deviation or the exceedance; and

d. a signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(3) Re-validation results:

The owner or operator shall submit to the appropriate Ohio EPA District Office the results of any re-validation test or method within three months after completion of such test or method.

5. **PAL Compliance Demonstration**

a) Emission calculations to demonstrate compliance with the PAL include VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from startups, shutdowns, and malfunctions.

b) The permittee shall determine monthly VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions in accordance with the Monitoring and Record Keeping Requirements for each emissions unit for the purpose of summing plant-wide VOC, NOx, CO, SO2, PM, PM10, and PM2.5 emissions and determining the rolling, 12-month VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions.

6. **PAL Permit Requirements**

a) The PAL in section B shall be effective for ten years. The PAL term commences on the date of issuance of this permit.

b) If the permittee chooses to renew this PAL, the permittee shall submit a complete application between six and eighteen months prior to the expiration of the PAL. This PAL shall not expire until a revised PAL permit is issued if a complete application is received by appropriate District Office within the time frame specified. (OAC rule 3745-31-32(A)(9)(b))

(1) If the permittee fails to meet the application requirements in section B or the PAL expires, the facility is subject to the requirements of OAC rule 3745-31-32(A)(8).

(2) This permit authorizes projects involving the installation of new emissions units and modification of existing emissions units that do not require an increase in emissions limitations provided that the new emissions unit or modification of any existing emissions unit(s) will not cause the violation of any applicable air requirement.

(3) A demonstration that the new or modified emissions unit meets these criteria shall be kept on site for the life of the new or modified emissions unit and made available to the Ohio EPA upon request. The permittee must notify the appropriate Ohio EPA District office of the installation of the new emissions unit or modification of an existing emissions unit 30 days before the installation or modification of the emissions unit.

7. **Revisions to Best Available Technology (BAT) Limits During a Modification under the PAL**

a) Background

Under OAC rule 3745-31-05, all new or modified air contaminant sources, with the exception of sources subject to exemptions and permits-by-rule as defined in OAC rule 3745-31-03, must employ Best Available Technology (BAT) as defined in OAC rule 3745-31-01. BAT requirements have been defined for each air contaminant source contained in this permit.

Under ORC 3704.03(F)(2), no installation permit is required to be obtained for activities that occur under the Plant-wide Applicability Limit (PAL) permit if the activities are subject to and in compliance with any applicable PAL and subject to and in compliance with any applicable PAL rules contained in OAC Chapter 3745-31.

Under these provisions, a permit-to-install or permit-to-install and operate is not required to be obtained when an emissions unit covered by the PAL is installed or modified. However, PAL permit emissions units that are installed or modified during the life of the PAL permit must continue to (for an existing source) or begin to (for a new source) employ BAT where applicable.

b) New or Modified Emissions Unit BAT Requirements

Prior to installation or modification of an emissions unit covered under the PAL permit, the owner or operator shall evaluate applicability, and, if applicable, determine BAT. This evaluation and determination shall follow applicable Ohio EPA air quality rules, guidelines, and policies associated with BAT determinations. The determination of BAT shall include the following steps, as appropriate:

(1) Determination of the size and type of emissions unit that will be considered a “substantially similar source” for the BAT determination purposes.

(2) Researching emissions limits or work practices for known similar sources. At a minimum, the research should include reviewing the Ohio EPA BAT database, U.S. EPA’s BACT/RACT/LAER database, reviewing applicable state regulation limits (excluding severe non-attainment area regulations), and permits from other similar sources. Only “substantially similar sources” that have been demonstrated to operate

satisfactorily in Ohio or other states with similar air quality should be included in this research.

(3) Completing a cost-effectiveness analysis following Ohio EPA, Division of Air Pollution Control Engineering Guide #46 for any pollutant where the uncontrolled potential-to-emit is greater than 70 tons per year. The uncontrolled potential-to-emit should take into account any federally enforceable limitations or physical limitations on the potential-to-emit.

(4) A determination of emission rate units to be used for the BAT determination. The units should be consistent with the units utilized in similar Ohio EPA issued emissions unit permits.

(5) A determination of the monitoring, record keeping, and reporting requirements for the BAT determination. The monitoring, record keeping, and reporting requirements shall be consistent with the monitoring, record keeping, and reporting requirements already established as part of the PAL permit.

(6) A determination of the compliance method to be used for the BAT determination. The compliance method shall be consistent with the compliance method utilized in the PAL permit for similar emissions units or in similar emissions unit permits issued by Ohio EPA.

(7) An evaluation of the above information and a determination concerning the selected BAT.

c) The results of the BAT determination shall include, at a minimum, the following:

(1) a description of the type of emissions unit evaluated;

(2) the numerical BAT value selected;

(3) the emission rate unit selected;

(4) a description of any associated control equipment selected as BAT;

(5) a description of any federally enforceable restrictions requested to be used; and

(6) a description of any work practices, raw material specifications, throughput limitations, and source design characteristics to be used.

The owner or operator may consult with Ohio EPA for assistance in determining an acceptable BAT determination.

d) Once the new or modified source is installed and operating, the owner or operator shall comply with the BAT determination selected utilizing the compliance determination selected. In addition, the owner or operator shall follow any monitoring, record keeping, and reporting selected to support the BAT determination.

e) The BAT determination selected by the owner or operator, and its associated monitoring, record keeping, reporting, and compliance determination methods shall be effective until the director issues a revised permit containing a reevaluation and redetermination of BAT.

f) Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements outlined in B.7.b) through B.7.e), and the following paragraph, shall be considered void and no longer required for changes made in compliance with the requirements of the PAL permit.

8. **New or Modified Emissions Unit BAT Reporting**

Under OAC paragraph 3745-31-32(A)(13)(a)(iv), the owner or operator of the PAL permit shall submit a list of any emissions units modified or added to the major stationary source during the preceding six-month reporting period. In addition to the information required to be submitted under OAC paragraph 3745-31-32(A)(13)(a) for the required semi-annual report, the owner or operator of the PAL permit shall include a report describing the work that was done to determine BAT for a new or modified source. This report shall include, at a minimum, the background information collected for the BAT determination and the information described in B.7.

9. The terms and conditions contained in this permit shall supercede the terms and conditions for premise 0546000133 in Permit to Install (PTI) P0103649 issued 07/15/2008, for emissions units F602.

10. In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," emissions units B601, B602, B603, B604, and B605 are considered "existing limited use stationary reciprocating internal combustion engines" and therefore are not required to meet the requirements of the subpart and of 40 CFR 63, Subpart A. They are considered "limited use" because they are operated less than 100 hours per year.

If the permittee elects to operate B601, B602, B603, B604, and/or B605 as a new affected source other than a limited use RICE then all of the requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply to the emissions unit(s).

C. Emissions Unit Terms and Conditions

1. F601, MEI: Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Roadways and Parking Areas associated with the Midwest Express facilities.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period. Employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
b.	OAC rules 3745-17-07(B) and 3745-17-08(B)	See Section b)(2), below.
c.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide PM, PM10, and PM2.5 emissions applies to this emissions unit. The PAL for PM, PM10, and PM2.5 is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total PM, PM10, and PM2.5 emissions from this facility as specified in B.2.

(2) Additional Terms and Conditions

a. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

ID 1 Main access road

ID 2 Clark entrance and associate parking

ID 3 2B drive and associate parking

ID 4 2A drive and associate parking

ID 5 2A/2B/2C/2D/2E main access road

ID 6 2B north access road exit

ID 7 2A south access road exit

ID 8 Clark/2C access segment

ID 9 2D access segment

ID 10 2F main entrance drive

ID 11 2F associate and visitor parking

ID 12 2F west segment

ID 13 2F south segment

ID 14 2F east segment.

b. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall employ vacuum assisted sweeping for the paved roadways and parking areas at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

d. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

e. The permittee shall require that operators of open-bodied vehicles transporting materials likely to become airborne to keep such materials covered if the control measure is necessary for the materials being transported.

f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

g. This emissions unit is not located in an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, the emissions unit is not subject to the RACM requirements established in OAC rule 3745-17-08(B) and the visible emission limitations specified in OAC rule 3745-17-07(B).

h. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

i. Section b)(1)a.;

ii. Section b)(2)a. thru f.; and

iii. Section d)(1) thru (4).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise specified in this section, the permittee shall perform weekly inspections of the paved roadways and parking areas, as identified in b)(2).

After the permittee has performed weekly inspections of the paved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved roadways and parking areas once per month. If visible particulate emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an inspection frequency of once per week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions as stated in d).

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) The permittee may, upon receipt of written approval from Ohio EPA Southwest District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

(4) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(4)d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(5) Reconfiguration of the roadways and parkways areas and variations in traffic patterns at this facility may not be a modification under OAC rule 3745-31-01 as long as emissions are equal to or less than the established PTI limitations. If the change is determined to be a modification then the permittee must apply for and obtain a permit to install prior to the installation of the change.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

a. each instance when an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

f) Testing Requirements

(1) Compliance with the emissions limitations in Term b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

2. F602, Gravel parking area

Operations, Property and/or Equipment Description:

Unpaved Trailer parking area

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute period.
b.	OAC rule 3745-17-07(B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	See section b)(2), below
c.	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	See sections b)(2)a. through b)(2)f., below.
d.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide PM, PM10, and PM2.5 emissions applies to this emissions unit. The PAL for PM, PM10, and PM2.5 is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total PM, PM10, and PM2.5 emissions from this facility as specified in B.2.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the

permittee'sapplication, the permittee has committed to treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

c. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

d. Any unpaved roadway or parking area that is subsequently paved, will require a General Permit for paved roadways and parking areas.

e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

g. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

i. Section b)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

unpaved roadways and parking areas	minimum inspection frequency
all roads and parking areas	daily

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

(4) The information required in Term d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter

e) Reporting Requirements

(1) The permittee shall submit deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

f) Testing Requirements

(1) Compliance with the emission limitations in Term b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.