



11/12/2014

Ms. Jean Anderson
Solvay Specialty Polymers USA, L.L.C.
17005 State Route 7
Post Office Box 446
Marietta, OH 45750-0446

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0684020008
Permit Number: P0116923
Permit Type: Administrative Modification
County: Washington

Certified Mail

Table with 2 columns: Yes/No and various permit categories like TOXIC REVIEW, PSD, SYNTHETIC MINOR TO AVOID MAJOR NSR, etc.

Dear Permit Holder:

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

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

How to appeal this permit

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

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

## **How to save money, reduce pollution and reduce energy consumption**

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

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)3858501 or the Office of Compliance Assistance and Pollution Prevention at (614)644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-SEDO; Pennsylvania; West Virginia



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Solvay Specialty Polymers USA, L.L.C.**

Facility ID:	0684020008
Permit Number:	P0116923
Permit Type:	Administrative Modification
Issued:	11/12/2014
Effective:	11/12/2014





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Solvay Specialty Polymers USA, L.L.C.

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**Final Permit-to-Install**  
Solvay Specialty Polymers USA, L.L.C.  
**Permit Number:** P0116923  
**Facility ID:** 0684020008  
**Effective Date:** 11/12/2014

## Authorization

Facility ID: 0684020008  
Facility Description: Plastic materials  
Application Number(s): M0000291, M0000956, M0001746, A0050682, A0051401  
Permit Number: P0116923  
Permit Description: Administrative modification to permit the installation of three process tanks that were originally permitted under PTI 06-08420 but were not installed; no change in PTE  
Permit Type: Administrative Modification  
Permit Fee: \$300.00  
Issue Date: 11/12/2014  
Effective Date: 11/12/2014

This document constitutes issuance to:

Solvay Specialty Polymers USA, L.L.C.  
17005 State Route 7  
Post Office Box 446  
Marietta, OH 45750

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

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install**  
Solvay Specialty Polymers USA, L.L.C.  
**Permit Number:** P0116923  
**Facility ID:** 0684020008  
**Effective Date:** 11/12/2014

## Authorization (continued)

Permit Number: P0116923  
Permit Description: Administrative modification to permit the installation of three process tanks that were originally permitted under PTI 06-08420 but were not installed; no change in PTE

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

<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Polysulfone Process
Superseded Permit Number:	06-08420
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	Radel Process Unit
Superseded Permit Number:	06-08420
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Solvay Specialty Polymers USA, L.L.C.  
**Permit Number:** P0116923  
**Facility ID:** 0684020008  
**Effective Date:** 11/12/2014

## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. 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 re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
  - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, and (ii) any deviations from operational restrictions.



and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

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



notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
  - (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, Southeast 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.



## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in



OAC Chapter 3745-31) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.



**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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.

**16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. 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.



**Final Permit-to-Install**  
Solvay Specialty Polymers USA, L.L.C.  
**Permit Number:** P0116923  
**Facility ID:** 0684020008  
**Effective Date:** 11/12/2014

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) B.5.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart FFFF: P003 and P010. The complete MACT requirements, including the MACT General provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
3. The permittee shall document and maintain a record of the following information and shall have the record on-file before beginning actual construction:
  - a) a description of the NSR project;
  - b) identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the NSR project; and
  - c) a description of the applicability test used to determine that the NSR project is not a major modification for any regulated NSR pollutant, including baseline actual emissions, the projected actual emissions, the amount of "could have accommodated" emissions excluded under (AAAAA)(1)(c) of the Ohio Administrative Code rule 3745-31-01 and an explanation for why such amount was excluded, and any netting calculations, if applicable.
4. The permittee shall calculate the emissions of VOC from emissions units P003 and P010 and identified within the associated Permit to Install application, and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change.
5. Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions of lead, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



**Final Permit-to-Install**  
Solvay Specialty Polymers USA, L.L.C.  
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## **C. Emissions Unit Terms and Conditions**



**1. P003, Udel Unit**

**Operations, Property and/or Equipment Description:**

UdelUnit controlled with thermal oxidizer(s) and wet scrubbers (shared with emissions unitP010). Organic HAP emissions shall be controlled by a thermal oxidizer and the resulting halogen halide emissions shall be controlled by a wet scrubber. All emissions from P003 and P010 are combined in a single, closed vent header. The closed vent header can go to one thermal oxidizer (UD 745 or UD 725) or both thermal oxidizers simultaneously (in parallel). Thermal Oxidizer UD 745 is followed by wet scrubber UD 751 and Thermal Oxidizer UD725 is followed by wet scrubber UD 731. This PTI supersedes PTI 06-08420, issued 9/25/2008, serves as an administrative modification to modify terms and conditions to reflect the delayed installation of Filtrate Tank (QC Tank C-1570), Filtrate Tank (QC Tank C-1571), and Filtered Resin Tank (Blend Tank C-1577) in P010.

- 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)	<p>Total point source VOC emissions from this emissions unit and P010 shall not exceed 31.71 lbs/hour and 138.9 tons per year.</p> <p>Total fugitive VOC emissions from this emissions unit shall not exceed 107 tons, based on a rolling, 12-month summation.</p> <p>A Leak Detection and Repair program shall be maintained in accordance with 40 CFR 63, Subpart FFFF. See b)(2)f.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart FFFF, UU, and A.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	Visible emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule. See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(A), Table 1	Total particulate emissions shall not exceed 32.2 lbs/hr from the North and South Wet Scrubbers (UD-731 and UD-751). See b)(2)c.
e.	40 CFR Part 63, Subpart FFFF (40 CFR 63.2430- 2550)  [For purposes of 40 CFR 63, Subpart FFFF, this emissions unit is an existing miscellaneous chemical manufacturing process unit (MCPU) with associated storage tanks, transfer racks, wastewater, and equipment leak requirements.]	The thermal oxidizer shall achieve a control efficiency of equal to or greater than 98 percent by weight or an outlet concentration of less than or equal to 20 ppmv as organic HAP or TOC.  The wet scrubber shall achieve a control efficiency of greater than or equal to 99 percent by weight or an outlet concentration of less than or equal to 0.45 kg/hr, or 20 ppmv for hydrogen halides and halogen HAP [as defined in 63.2550(i)].
f.	40 CFR Part 63, Subpart UU (40 CFR 63.1019-1039)  [In accordance with 40 CFR 63.2480, the permittee has elected to comply with the requirements of Subpart UU to satisfy the LDAR requirements of Subpart FFFF.]	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).  See b)(2)d.
g.	40 CFR Part 63, Subpart A (40 CFR 63.1-15)	Table 12 to Subpart FFFF of 40 CFR Part 63 – Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.  The provisions of this 40 CFR Part 63, Subpart A do not apply to Subpart UU except as noted in the referencing subpart (Subpart FFFF).

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxide, sulfur dioxide, carbon monoxide, particulate emissions and lead from this air contaminant source since the uncontrolled potential to emit for nitrogen oxide, sulfur dioxide, carbon monoxide, particulate emissions, and lead is less than 10 tons/year.



- b. The presence of water vapor in the scrubber plume does not constitute visible emissions.
  - c. The short-term limit for particulate emissions for this source is calculated according to OAC rule 3745-17-11, Table I and Figure II and does not reflect the potential to emit for the North and South Wet Scrubbers (UD-731 and UD-751).
  - d. Control, detection and timely repair of leaks from equipment subject to 40 CFR 63, Subpart UU will occur in accordance with the following sections:
    - i. for valves in gas and vapor service and in light liquid service, 63.1025;
    - ii. for pumps in light liquid service, 63.1026
    - iii. for connectors in gas and vapor service and in light liquid service, 63.1027;
    - iv. for agitators in gas and vapor service and in light liquid service, 63.1028
    - v. for pumps, valves, connectors, and agitators in heavy liquid service; pressure relief devices in liquid service and instrumentation systems, 63.1029
    - vi. for pressure relief devices in gas and vapor service, 63.1030;
    - vii. for compressors, 63.1031;
    - viii. for sampling connection systems, 63.1032;
    - ix. for open-ended valves or lines, 63.1033; and,
    - x. for closed vent systems and control devices, 63.1034.
- c) Operational Restrictions
- (1) When the emissions unit(s) is/are in operation, all of the VOC emissions shall be vented to the thermal oxidizer/wet scrubber control system in a manner consistent with the requirements of 40 CFR 63, Subpart FFFF and as necessary to comply with the limits contained in this permit. This requirement does not apply to fugitive VOC emissions from equipment leaks (e.g., valves, pumps, connectors, agitators, pressure relief devices).
  - (2) The permittee shall burn only natural gas in the thermal oxidizer(s).
  - (3) See 40 CFR Part 63, Subpart FFFF (40 CFR 63.2430- 2550).
  - (4) See 40 CFR Part 63, Subpart UU (40 CFR 63.1019-1039).



d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas in the thermal oxidizer, the permittee shall maintain a record of the type and quantity of fuel burned.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit i.e, the stacks for the wet scrubbers (UD-731/751). The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- (3) The permittee shall collect and record the following information on a rolling, 12-month basis:
  - a. the amount of fugitive VOC from each emissions unit (P003 and P010), in tons, determined using the commercially available software package called LEAKDAS or other methodologies presented in U.S EPA's Protocol for Equipment Leak Emission Estimates published in 1995.
- (4) See 40 CFR Part 63, Subpart FFFF (40 CFR 63.2430- 2550).
- (5) See 40 CFR Part 63, Subpart UU (40 CFR 63.1019-1039).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports to the Director (the Ohio EPA, Southeast District office) that identify, based upon the record keeping in Section d)(3) each exceedance of the rolling, 12-month fugitive VOC emission limitation.



- (2) The permittee shall submit semiannual written reports that
  - a. identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and
  - b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the 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 six-month periods.

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the thermal oxidizer(s). Each report shall be submitted within 30 days after the deviation occurs.
- (4) See 40 CFR Part 63, Subpart FFFF (40 CFR 63.2430- 2550).
- (5) See 40 CFR Part 63, Subpart UU (40 CFR 63.1019-1039).

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 20 % opacity as a six-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

- b. Emissions Limitation:

Total point source VOC emissions from this emissions unit and P010 shall not exceed 31.71 lbs/hour and 138.9 tons per year.

Applicable Compliance Method:

Compliance shall be determined based on the maximum design capacity of the thermal oxidizer and design case information provided by the permittee(1,585.5 lbs VOC/hr) and a destruction efficiency of 98% for the thermal oxidizer.

$$(\text{Total VOC to Thermal Oxidizer (lb VOC/hr)})(1.0 - \text{control efficiency}) =$$

$$(1,585.5 \text{ lbs VOC/hr})(1.0 - 0.98) = 31.7 \text{ lb VOC/hr}$$

Organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR,



Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office. See f)(2).

Compliance with the annual VOC limitation shall be demonstrated using the following calculation based on the short term limit (lb/hr) and the maximum annual operating schedule:

$$(31.7 \text{ lb/hr})(8,760 \text{ hrs/yr})(0.0005 \text{ ton/lb}) = 138.9 \text{ TPY VOC}$$

c. Emissions Limitation:

Total fugitive VOC emissions from this emissions unit shall not exceed 107 tons, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month summation limitation for fugitive VOCs shall be demonstrated based upon the record keeping required in d)(3).

d. Emissions Limitation:

The thermal oxidizer shall achieve a control efficiency of equal to or greater than 98 percent by weight or an outlet concentration of less than or equal to 20 ppmv as organic HAP or TOC.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" and additional procedures outlined in 40 CFR 63, Subpart SS. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office. See f)(2).

e. Emissions Limitation:

The wet scrubber shall achieve a control efficiency of greater than or equal to 99 percent by weight or an outlet concentration of less than or equal to 0.45 kg/hr, or 20 ppmv for hydrogen halides and halogen HAP [as defined in 63.2550(i)].

Applicable Compliance Method:

Compliance shall be demonstrated according to test Methods 1 - 4, and 26 or 26A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" and additional procedures outlined in 40 CFR 63, Subpart SS Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office. See f)(2).



f. Emissions Limitation:

Particulate emissions shall not exceed 32.2 lbs/hr from the North and South Wet Scrubbers (UD-731 and UD-751).

Applicable Compliance Method:

If required, compliance with the 32.2 lbs/hr of particulate emissions shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

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

a. The emissions testing shall be conducted based on the schedule specified in 40 CFR 63.2450(g)(5) or any approved extensions granted pursuant to 40 CFR 63.6(i).

b. The emission testing shall be conducted to demonstrate compliance with 40 CFR 63, Subpart FFFF emission limitations for organic HAPs and combined hydrogen halide and halogen HAP.

c. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOCs and the overall control efficiency limitation for VOC, HAPs, hydrogen halides and halides.

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

for VOC, Methods 1 - 4, and 18, 25, or 25A of 40 CFR Part 60, Appendix A;

for hydrogen halides and halogen HAPs, Methods 1-4, and Method 26 or 26A of 40 CFR Part 60, Appendix A; and

Any applicable method or procedure specified by 40 CFR 63 Subpart FFFF.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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



and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

g) **Miscellaneous Requirements**

- (1) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 06-08420 issued on September 25, 2008.



**2. P010, Radel Unit**

**Operations, Property and/or Equipment Description:**

Radel Unit controlled with thermal oxidizer(s) and wet scrubbers (shared with emissions unit P003) and nine material handling baghouses and wet scrubbers. All emissions from P003 and P010 are combined in a single, closed vent header. The closed vent header can go to one thermal oxidizer (UD 745 or UD 725) or both thermal oxidizers simultaneously (in parallel). Thermal Oxidizer UD 745 is followed by wet scrubber UD 751 and Thermal Oxidizer UD725 is followed by wet scrubber UD 731. This PTI supersedes PTI 06-08420, issued 9/25/2008, and serves as an administrative modification to modify terms and conditions to reflect the delayed installation of Filtrate Tank (QC Tank C-1570), Filtrate Tank (QC Tank C-1571), and Filtered Resin Tank (Blend Tank C-1577).

- 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)	<p>Total point source VOC emissions from this emissions unit and P003 shall not exceed 31.71 lbs/hour and 138.9 tons per year.</p> <p>Total fugitive VOC emissions from this emissions unit shall not exceed 81.68 tons, based on a rolling, 12-month summation.</p> <p>A Leak Detection and Repair program shall be maintained in accordance with 40 CFR 63, Subpart FFFF. See b)(2)g.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart FFFF, UU, and A.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)a.
c.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b. and b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Voluntary restriction to avoid BAT.)	
d.	OAC rule 3745-17-07(A)	Visible emissions from any stack shall not exceed 20% opacity, as a six-minute average. See b)(2)d.
e.	OAC rule 3745-17-11(A)	Particulate emissions (PE) shall not exceed 32.2 lbs/hr from the North and South Wet Scrubbers (UD-731 and UD-751). See b)(2)e. PE shall not exceed 47.3 lbs/hr from the material handling and transfer baghouses and wet scrubbers. See b)(2)f.
f.	40 CFR Part 63, Subpart FFFF (40 CFR 63.2430- 2550)  For purposes of 40 CFR 63, Subpart FFFF, this emissions unit is an existing miscellaneous chemical manufacturing process unit (MCPU) with associated storage tanks, transfer racks, wastewater, and equipment leak requirements.	The thermal oxidizer shall achieve a control efficiency of 98% or an outlet concentration of less than or equal to 20 ppmv as organic HAP or TOC.  The wet scrubber shall achieve a control efficiency of 99% or greater, by weight, or an outlet concentration of less than or equal to 0.45 kg/hr, or 20 ppmv for hydrogen halides and halogen HAP [as defined in 63.2550(i)].
g.	40 CFR Part 63, Subpart UU (40 CFR 63.1019-1039)  [In accordance with 40 CFR 63.2480, the permittee has elected to comply with the requirements of Subpart UU to satisfy the LDAR requirements of Subpart FFFF.]	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See b)(2)g.
h.	40 CFR Part 63, Subpart A (40 CFR 63.2540) (40 CFR 63.1019)	Table 12 to Subpart FFFF of 40 CFR Part 63 – Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.  The provisions of this 40 CFR Part 63, Subpart A do not apply to Subpart UU except as noted in the referencing subpart (Subpart FFFF).

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxide, sulfur dioxide, carbon monoxide and



lead from this air contaminant source since the uncontrolled potential to emit for nitrogen oxide, sulfur dioxide, carbon monoxide and lead is less than 10 tons/year.

- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Permit to Install P0116923 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. the proper operation of baghouses (Y-1519 DC, Y-217, Y-266 and Y-520A) and wet scrubbers (Y-1216, Y-218, Y-567, Y1567) to control particulate emissions; and
- ii. the combustion of natural gas in the thermal oxidizers to maintain uncontrolled particulate emissions under 10 tons per year.
- d. The presence of water vapor in the scrubber plume does not constitute visible emissions.
- e. The short-term limit for particulate emissions is calculated according to OAC rule 3745-17-11, Table 1 and does not reflect the potential to emit for the North and South Wet Scrubbers (UD-731 and UD-751).
- f. The short-term limit for particulate emissions for this source is calculated according to OAC rule 3745-17-11 and does not reflect the potential to emit for the baghouses (Y-1519 DC, Y-217, Y-266, and Y-520A) and wet scrubbers (Y-1216, Y-218, Y-567 and Y-1567) included in this emissions unit.
- g. Control, detection and timely repair of leaks from equipment subject to 40 CFR Part 63, Subpart UU will occur in accordance with the following sections:
  - i. for valves in gas and vapor service and in light liquid service, 63.1025;
  - ii. for pumps in light liquid service, 63.1026



- iii. for connectors in gas and vapor service and in light liquid service, 63.1027;
- iv. for agitators in gas and vapor service and in light liquid service, 63.1028
- v. for pumps, valves, connectors, and agitators in heavy liquid service; pressure relief devices in liquid service and instrumentation systems, 63.1029
- vi. for pressure relief devices in gas and vapor service, 63.1030;
- vii. for compressors, 63.1031;
- viii. for sampling connection systems, 63.1032;
- ix. for open-ended valves or lines, 63.1033; and,
- x. for closed vent systems and control devices, 63.1034.

c) Operational Restrictions

- (1) When the emissions unit(s) is/are in operation, all of the VOC emissions shall be vented to the thermal oxidizer/wet scrubber control system in a manner consistent with the requirements of 40 CFR 63, Subpart FFFF and as necessary to comply with the limits contained in this permit. This requirement does not apply to fugitive VOC emissions from equipment leaks (e.g., valves, pumps, connectors, agitators, pressure relief devices).
- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) See 40 CFR Part 63, Subpart FFFF (40 CFR 63.2430- 2550).
- (4) See 40 CFR Part 63, Subpart UU (40 CFR 63.1019-1039).

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas in the thermal oxidizers, the permittee shall maintain a record of the type and quantity of fuel burned.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit, including the stacks for the baghouses (Y-1519 DC, Y-217, Y-266 and Y-520A) and wet scrubbers (UD-731/751, Y-1216, Y-218, Y-567 and Y-1567). The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;



- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- (3) The permittee shall collect and record the following information on a rolling, 12-month basis:
  - a. the amount of fugitive VOC from each emissions unit (P003 and P010), in tons, determined using the commercially available software package called LEAKDAS or other methodologies presented in U.S EPA's Protocol for Equipment Leak Emission Estimates published in 1995.
- (4) See 40 CFR Part 63, Subpart FFFF (40 CFR 63.2430- 2550).
- (5) See 40 CFR Part 63, Subpart UU (40 CFR 63.1019-1039).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports to the Director (the Ohio EPA, Southeast District office) that identify, based upon the record keeping in Section d)(3), each exceedance of the rolling, 12-month fugitive VOC emission limitation.
- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the 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. 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.
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.



(4) See 40 CFR Part 63, Subpart FFFF (40 CFR 63.2430- 2550).

(5) See 40 CFR Part 63, Subpart UU (40 CFR 63.1019-1039).

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1)a. and d. of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

b. Emissions Limitation:

Total point source VOC emissions from this emissions unit and P003 shall not exceed 31.71 lbs/hour and 138.9 tons per year.

Applicable Compliance Method:

Compliance shall be determined based on the maximum design capacity of the thermal oxidizer and design case information provided by the permittee (1,585.5 lbs VOC/hr) and a destruction efficiency of 98% for the thermal oxidizer.

$(\text{Total VOC to Thermal Oxidizer (lb VOC/hr)})(1.0 - \text{control efficiency}) =$

$$(1,585.5 \text{ lbs VOC/hr})(1.0 - 0.98) = 31.7 \text{ lb VOC/hr}$$

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual VOC limitation shall be demonstrated using the following calculation based on the short term limit (lb/hr) and the maximum annual operating schedule:

$$(31.7 \text{ lb/hr})(8,760 \text{ hrs/yr})(0.0005 \text{ ton/lb}) = 138.9 \text{ TPY VOC}$$

c. Emissions Limitation:

Total fugitive VOC emissions from this emissions unit shall not exceed 81.68 tons, based on rolling, 12-month summations.



Applicable Compliance Method:

Compliance with the rolling, 12-month summation limitation for fugitive VOCs shall be demonstrated based upon the record keeping required in d)(3).

e. Emissions Limitation:

The thermal oxidizer shall achieve a control efficiency of equal to or greater than 98 percent by weight or an outlet concentration of less than or equal to 20 ppmv as organic HAP or TOC.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" and additional procedures outlined in 40 CFR 63, Subpart SS. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office. See f)(2).

f. Emissions Limitation:

The wet scrubber shall achieve a control efficiency of greater than or equal to 99 percent by weight or an outlet concentration of less than or equal to 0.45 kg/hr, or 20 ppmv for hydrogen halides and halogen HAP [as defined in 63.2550(i)].

Applicable Compliance Method:

Compliance shall be demonstrated according to test Methods 1 - 4, and 26 or 26A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" and additional procedures outlined in 40 CFR 63, Subpart SS Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office. See f)(2).

g. Emissions Limitation:

Particulate emissions shall not exceed 32.2 lbs/hr from the North and South Wet Scrubbers (UD-731 and UD-751).

Applicable Compliance Method:

If required, compliance with the 32.2 lbs/hr of particulate emissions shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

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



- a. The emissions testing shall be conducted based on the schedule specified in 40 CFR 63.2450(g)(5) or any approved extensions granted pursuant to 40 CFR 63.6(i).
  - b. The emission testing shall be conducted to demonstrate compliance with 40 CFR 63, Subpart FFFF emission limitations for organic HAPs and combined hydrogen halide and halogen HAP.
  - c. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOCs and the overall control efficiency limitation for VOC, HAPs, hydrogen halides and halides.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):  
  
for VOC, Methods 1 - 4, and 18, 25, or 25A of 40 CFR Part 60, Appendix A;  
  
for hydrogen halides and halogen HAPs, Methods 1-4, and Method 26 or 26A of 40 CFR Part 60, Appendix A; and  
  
any applicable method or procedure specified by 40 CFR 63 Subpart FFFF.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) **Miscellaneous Requirements**
- (1) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 06-08420 issued on September 25, 2008.