



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

12/15/2014

Don Hock  
Superior Fibers Shawnee LLC  
P.O. Box 141  
9702 Ironpoint Road  
Shawnee, OH 43782

Certified Mail

Facility ID: 0664000067  
Permit Number: P0090271  
County: Perry

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 9/19/2014. 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](http://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, Southeast District Office  
2195 Front Street  
Logan, OH 43138

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,

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

Cc: Ohio EPA DAPC, Southeast District Office





## Response to Comments

Facility ID:	0664000067
Facility Name:	Superior Fibers Shawnee LLC
Facility Description:	Glass Fiber Mats.
Facility Address:	9702 Ironpoint Road PO Box 141 Shawnee, OH 43782 Perry County
Permit:	P0090271, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Perry County Tribune on 09/24/2014. The comment period ended on 10/24/2014.	
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.

### **Comments submitted by the facility:**

#### **1. Scrubber fan:**

- a. Comment: Page 24 – Section C.2.d)(4)j. - Request removal of the first section (the current of the high static pressure scrubber fan). There are no parameters listed for this nor is it a controlling factor of the efficiency.
- b. Response: We have removed the reference to “the current of the high static pressure scrubber fan” from Section C.2.d)(5)j.

#### **2. Weekly checks:**

- a. Comment: Page 31 – section C.3.d)(1) - Request that the first section (The permittee shall perform daily checks) be changed to weekly checks. Weekly checks have been performed since at least 2002 without issue. This error was included in the original version of latest PTI and was not corrected in error.



- b. Response: Daily checks were established in the Chapter 31 administrative modification without any comments from the facility and, thus, duplicated in the Title V PTO. Ohio EPA is agreeable to changing “daily” checks to “weekly” checks, and has revised this language.

**3. Formula correction:**

- a. Comment: Page 32 – Section C.3.D)(2)f. - Request formula correction from d)(2)(e) divided by d)(2)(f) to d)(2)(d) divided by d)(2)(e).
- b. Response: The formula calculation has been fixed.

**4. Formula correction:**

- a. Comment: Page 32 – Section C.3.D)(2)h. – Request formula correction from d)(1)(b) times d)(1)(c) to d)(2)(b) divided by d)(2)(c).
- b. Response: The recordkeeping requirements have been revised and compliance under testing requirements has been updated to reflect the annual calculation methodology.

**5. Weekly checks:**

- a. Comment: Page 40 – Section C.4.d)(1) – Request that the first section (The permittee shall perform daily checks) be changed to weekly checks. Weekly checks have been performed since at least 2002 without issue. This error was included in the original version of latest PTI and was not corrected in error.
- b. Response: Daily checks were established in the Chapter 31 administrative modification without any comments from the facility and, thus, duplicated in the Title V PTO. The facility has submitted an administrative modification permit application to request “weekly” checks instead of “daily” checks. Ohio EPA has agreed to change “daily” checks to “weekly” checks.

**6. Formula correction:**

- a. Comment: Page 41 – Section C.4.D)(2)f. – Request formula correction from d)(2)(e) divided by d)(2)(f) to d)(2)(d) divided by d)(2)(e).
- b. Response: The formula calculation has been fixed.

**7. Formula correction:**

- a. Comment: Page 41 – Section C.4.D)(2)h. – Request formula correction from d)(1)(b) times d)(1)(c) to d)(2)(b) divided by d)(2)(c).
- b. Response: The recordkeeping requirements have been revised, and compliance under testing requirements has been updated to reflect the annual calculation methodology.

**8. Removal of diatomaceous earth filter:**

- a. Comment: Page 22 – Section C.2.b) – The diatomaceous earth filter is to be employed at all times when this emissions unit is in operation. Request removal of this requirement. With the PE limitation set under the 2002 permit at 1.50 lbs/hr, this filter was required to operate within the allowable limits according the 2004 stack test indicating 1.75 lbs/hr PE emissions. The new draft permit has corrected the PE allowable emission limit to 6.52 lbs/hr. Review of prior test



data, 1993 to 2007, indicates a maximum PE of 1.75 lbs/hr without the filter which is well below the revised allowable limit therefore the DE filter should not be required. ***(Note: comment was submitted past the 30-day Comment period (due on 10/24/14), on 11/6/14).***

- b. Response: The 2004 stack test failed at 1.8 lbs/hr as the tested rate, when the allowable was 1.5 lbs/hr. In 2005, the stack test passed for PE, but failed for OC. On 4/5/06, the facility submitted a compliance plan for the oven in which they committed to adding ALAR filtration unit to reduce both PE and OC emissions. Ohio EPA is not agreeable to removing the diatomaceous earth filter and this requirement will stand.

**9. OC split:**

- a. Comment: Page 25 – Section C.2.d)(7), Page 32 – Section C.3.d)(2)d.i., Page 41 – Section C.4.d)(2)d.i. – For the purposes of calculating... Request modification of this calculation (split). I would like to restate that Superior Fibers still does not agree with the new split of the emissions that was imposed. It is Superior's position that there should not have been any change to the 66% forming/spinning emissions. The 22% from the oven should remain there but as a result of the Vanceburg stack test be allocated as 16.1% fugitive and 5.9% stack. This 22% is released when the mats are unrolled on the let off table, heated up and then cured thru the oven. Superior Fibers continues its stance that 12% is retained in the product but consumed during the curing reaction with the resin. ***(Note: comment was submitted past the 30-day Comment period (due on 10/24/14), on 11/18/14).***
- b. Response: BAT determination was made during the processing of the Chapter 31 Modification PTI. We are not able to change BAT in an operating permit. If Superior Fibers wants to pursue an administrative permit modification, then supporting documents must be submitted with the application.





**PRELIMINARY PROPOSED**

**Division of Air Pollution Control  
Title V Permit  
for  
Superior Fibers Shawnee LLC**

Facility ID:	0664000067
Permit Number:	P0090271
Permit Type:	Renewal
Issued:	12/15/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Superior Fibers Shawnee LLC

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**Preliminary Proposed Title V Permit**

Superior Fibers Shawnee LLC

**Permit Number:** P0090271

**Facility ID:** 0664000067

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0664000067  
Facility Description: Glass Fiber Mats.  
Application Number(s): A0021568, A0050358  
Permit Number: P0090271  
Permit Description: Title V renewal permit for one curing oven, 42 forming drums and unpaved roadways and parking areas.  
Permit Type: Renewal  
Issue Date: 12/15/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0090270

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

Superior Fibers Shawnee LLC  
9702 Ironpoint Road  
PO Box 141  
Shawnee, OH 43782

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 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, Southeast 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



**Preliminary Proposed Title V Permit**  
Superior Fibers Shawnee LLC  
**Permit Number:** P0090271  
**Facility ID:** 0664000067  
**Effective Date:** To be entered upon final issuance

## **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 recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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



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

- (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 submitted scheduled 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, Southeast 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, Southeast 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, Southeast 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 permit except 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, 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.
- 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, Southeast 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 intermittent consistent 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, Southeast 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, Southeast 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, no emissions unit identified in this permit that has been certified 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 Requirements Under 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 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 (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, Southeast 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 Requirements Under 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, Southeast 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, Southeast 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 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 Ohio EPA DAPC, Southeast 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.



**Preliminary Proposed Title V Permit**

Superior Fibers Shawnee LLC

**Permit Number:** P0090271

**Facility ID:** 0664000067

**Effective Date:** To be entered upon final issuance

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



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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) None.



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## **C. Emissions Unit Terms and Conditions**



1. F012, Unpaved Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Unpaved Roadways and Parking Areas

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.	None	

(2) Additional Terms and Conditions

a. As defined in OAC rule 3745-31-01, this emissions unit is an existing fugitive source of particulate emissions (PE). As such, there are no requirements in the federal or state rules applicable to this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

a. None.



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g) Miscellaneous Requirements

(1) None.



**2. P001, Curing Oven**

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

Process Curing Oven for polyester resin coated glass fiber mats, with a maximum production rate of 4,000 pounds per hour (includes a natural gas-fired curing drum with a rated maximum capacity of 7.3 mmBtu/hr).

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) g)(1).

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 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	PE shall not exceed 6.52 pounds per hour.
c.	OAC rule 3745-21-07(M)(4)	Organic compound (OC) emissions shall not exceed 3.0 pounds per hour and 15 pounds per day unless said emissions are reduced by at least 85% by weight.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

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

b. The diatomaceous earth filter is to be employed at all times when this emissions unit is in operation.

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



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the Anderson Unit's wet scrubber demister, that must be maintained in order to demonstrate compliance, shall not exceed 0.75 inch of water.

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

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop range for the Anderson Unit's cabinet, that must be maintained in order to demonstrate compliance, shall not exceed 2.5 inches of water.

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

- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable Anderson Unit's gas temperature, that must be maintained in order to demonstrate compliance, shall not exceed 110 degrees Fahrenheit.

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

- (4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pH of the Anderson Unit's wet scrubber demister fluid, that shall be maintained in order to demonstrate compliance, shall be between 4.5 to 7.5.

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

- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the demister (in inch of water), the Anderson Unit's cabinet pressure (in inches of water), the Anderson Unit's exhaust gas temperature (in degrees Fahrenheit), and the pH of scrubber fluid while the emissions unit is in operation. The permittee shall record this information on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. pressure drop across the demister, cabinet pressure, exhaust gas temperature and pH of the scrubber fluid readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the pressure drop across the wet scrubber demister, the cabinet pressure, the exhaust gas temperature and the pH of the wet scrubber demister fluid are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

- (6) The permittee shall collect and record the following information for each day for the oven:
  - a. the total potential (prior to applying the booth/oven "split") uncontrolled daily organic compound emission rate for all resins employed in the forming operations associated with this emissions unit, multiplied by the maximum



percentage of the emissions associated with this emissions unit (as defined in condition d)(8) of this permit), in pounds per day; and

- b. the total number of hours this emissions unit was in operation (this number should be the same as the number of hours the associated forming operations were in operation); and
- c. the average hourly OC emission rate, i.e., (a)/(b), in lbs/hr (average).

- (7) For purposes of calculating the organic compound emission rates for this emissions unit (P001) and the associated forming drums (P002, P003, P005, P007-P045), the permittee shall utilize a value of 94.1% as the maximum percentage of the organic compounds employed in the forming drums that are emitted uncontrolled from the forming drums. The remaining 5.9% of the organic compounds employed in the forming drums shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of organic compound emissions between this emissions unit and the associated forming drums is based upon the material balance information provided by the company (January 2006 compliance stack test conducted on Curing Oven #2 at Vanceburg, KY).

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

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

- (2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. an identification of each hour during which the organic compound emissions exceeded 3 pounds per hour, and the actual organic compound emissions for each such hour; and
- b. an identification of each day during which the organic compound emissions exceeded 15 pounds per day, and the actual organic compound emissions for each such day.

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the demister, cabinet pressure, exhaust gas temperature and/or the pH of the scrubber fluid readings was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;



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- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
- c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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

- (4) The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

f) Testing Requirements

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

a. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

*(Authority for term: OAC rule 3745-17-07(A) and OAC rule 3745-77-07(C)(1))*

b. Emissions Limitation:

PE shall not exceed 6.52 pounds per hour.



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Applicable Compliance Method:

The hourly PEmissions limitation is a rule based limit established under OAC rule 3745-17-11(B), Table I, based on a process weight at maximum capacity of 4,000 lbs/hr. Compliance with the pounds per hour shall be demonstrated based upon the emission testing requirements specified in f)(2).

Particulate emissions shall be determined according to test Methods 1 - 5, 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.

*(Authority for term: OAC rule 3745-17-11(B) and OAC rule 3745-77-07(C)(1))*

c. Emissions Limitation:

Organic compound (OC) emissions shall not exceed 3.0 pounds per hour and 15 pounds per day unless said emissions are reduced by at least 85% by weight.

Applicable Compliance Method:

Compliance with the pounds per hour and pounds per day emission limitation is based upon the recordkeeping requirements under d)(7) and the emission testing requirements specified in f)(2).

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.

*(Authority for term: OAC rule 3745-21-07(M)(4) and OAC rule 3745-77-07(C)(1))*

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

- a. The emission testing shall be conducted within 30 days after start-up and approximately 2.5 years after issuance of the permit (following the effective date for the Title V permit), within 6 months prior to the permit expiration, and as required by the Director.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitations for particulates and OC.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The mass emissions of OC 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". The mass



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emissions of PE shall be determined according to test Methods 1 - 5, 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 the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- 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.

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

g) Miscellaneous Requirements

- (1) 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 for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year and per Ohio EPA's Engineering Guide #69, the pollutants are subject to MACT. OAC Chapter 3745 31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01.



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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 PTI.



**3. Emissions Unit Group - 12-foot Forming Drums: P002, P003, P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025 and P026. Each has a maximum resin usage of 7.15 pounds per hour and all are enclosed in a building.**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P002	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P003	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P005	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P008	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P009	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P010	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P011	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P012	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P013	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P014	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P015	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P016	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P017	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P018	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P019	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P020	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P021	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P022	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P023	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P024	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P025	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.
P026	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 12-foot forming drum.

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) d)(3), d)(4), d)(5), d)(6) and e)(5).

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) (established in PTI P0112342, issued 9/25/13)	Organic compound (OC) emissions shall not exceed 2.79 pounds per hour and 12.23 tons per year.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Particulate emissions (PE) shall not exceed 0.66 pound per hour and 2.9 tons per year.  There shall be no visible PE from this emissions unit.
b.	OAC rule 3745-17-07(B) and 3745-17-08(B)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. This facility is located in Perry County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the location and color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

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

(2) The permittee shall collect and record the following information each day for each emissions unit:

- a. the company name and identification number of each resin employed;
- b. the number of gallons of each resin employed;
- c. the OC content of each resin employed, in pounds per gallon, as applied;



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- d. the total potential (prior to applying the forming operations /oven “split”) daily OC emissions rate for all resins, in pounds;
  - i. For purposes of calculating the organic compound emission rates for these emissions units (P002, P003, P005, P007-P045) and the associated oven (P001), the permittee shall utilize a value of 94.1% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5.9% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This “split” of organic compound emissions between this emissions unit and the associated oven is based upon the material balance information provided by the company (January 2006 compliance stack test conducted on Curing Oven #2 at Vanceburg, KY).
- e. the total daily emissions attributed to this emissions unit;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly OC emissions rate for all resins, i.e., the sum of d)(2)(e) divided by d)(2)(f), in pounds per hour (average).

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

- (3) The permit-to-install (PTI) application for these emissions units was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Ohio’s Air Toxic Policy” was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold



Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Styrene

TLV (mg/m<sup>3</sup>): 85.20

Maximum Hourly Emission Rate (lbs/hr): 1.67

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 271.3

MAGLC (ug/m<sup>3</sup>): 2,028.63

The permittee, has demonstrated that emissions of Styrene, from emissions units P002, P003, P005, P007-P045, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114-01, and ORC 3704.03(F))*

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Ohio's Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Ohio's Air Toxic Policy", has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114-01, and ORC 3704.03(F))*

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Ohio's Air Toxic Policy":
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Ohio's Air Toxic Policy";
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Ohio's Air Toxic Policy", initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Ohio's Air Toxic Policy", and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114-01, and ORC 3704.03(F))*

- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Ohio's Air Toxic Policy", through the predicted 1-hour maximum ground-level concentration. The record



shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114-01, and ORC 3704.03(F))*

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

- (2) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible emissions of fugitive dust were observed from this emissions unit; and
  - b. any corrective actions taken to eliminate the visible 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.

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. an identification of each hour during which the organic compound emissions exceeded 2.79 pounds per hour, and the actual organic compound emissions for each such hour.

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

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

- (4) The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

- (5) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:



- a. the original model input;
- b. the updated model input;
- c. the reason for the change(s) to the input parameter(s); and
- d. a summary of the results of the updated modeling, including the input changes; and
- e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

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

f) **Testing Requirements**

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

- a. Emissions Limitation:

OC emissions shall not exceed 2.79 pounds per hour and 12.23 tons per year.

Applicable Compliance Method:

Compliance with the pounds per hour emissions limitation shall be demonstrated by the recordkeeping in d)(2).

The hourly OC limitation was established for PTI purposes to reflect the emissions unit's potential to emit using the following formula:

Emission factor: 830.299 lbs OC/ton binder

$(830.299 \text{ lbs OCs/ton of binder})(7.15 \text{ lbs/hr max binder feed rate})(94.1\% \text{ split of OCs emitted from forming drums}) / 2,000 \text{ lbs/ton} = 2.79 \text{ lbs OC/hr}$

[Note that the 5.9% emissions split for the oven and 94.1% emissions split for the forming drums comes from the January 26, 2006 stack test at the Vanceburg, KY plant]

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 emissions limitation shall be determined by adding the daily OC emissions, as recorded in d)(2)e., for each day in the calendar year, and divided by 2,000 lbs/ton.

*(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))*

b. Emissions Limitation:

PE shall not exceed 0.66 pound per hour and 2.9 tons per year.

Applicable Compliance Method:

Compliance with the pound per hour emission limitation shall be demonstrated based on the following calculations based on the information presented in the permittee's application:

The hourly PE limitation was established for PTI purposes to reflect the emissions unit's potential to emit using the following formula:

$$(66.14\% \text{ of solids content/ton of binder})(2,000 \text{ lbs/ton})(1-0.86 \text{ transfer efficiency}) = 185.192 \text{ lbs PE/ton of binder}$$

Emission factor: 185.192 lbs PE/ton of binder

$$(185.192 \text{ lbs PE/ton of binder})(7.15 \text{ lbs/hr max binder feed rate}) / 2,000 \text{ lbs/ton} = 0.66 \text{ lb PE/hr}$$

If required, particulate emissions shall be determined according to test Methods 1 - 5, 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 ton per year emission limitation shall be determined based on the following calculation:

$$\begin{aligned} \text{PE (tpy)} &= 0.66 \text{ lb PE/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \\ &= 2.9 \text{ tons per year} \end{aligned}$$

*(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))*

c. Emissions Limitation:

There shall be no visible PE from this emissions unit.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

*(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))*



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g) Miscellaneous Requirements

(1) None.



4. Emissions Unit Group - 18-foot Forming Drums: P007, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044 and P045. Each has a maximum resin usage of 7.15 pounds per hour and all are enclosed in a building.

EU ID	Operations, Property and/or Equipment Description
P007	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P027	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P028	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P029	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P030	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P031	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P032	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P033	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P034	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P035	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P036	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P037	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P038	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P039	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P040	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P041	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P042	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P043	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P044	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.
P045	Glass fiber forming furnace rated at 0.15 mmBtu/hr and 18-foot forming drum.

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) d)(3), d)(4), d)(5), d)(6) and e)(5).

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) (established in PTI P0112342, issued 9/25/13)	Organic compound (OC) emissions shall not exceed 2.79 pounds per hour and 12.23 tons per year.  Particulate emissions (PE) shall not exceed 0.66 pound per hour and 2.9 tons per year.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		There shall be no visible PE from this emissions unit.
b.	OAC rule 3745-17-07(B) and 3745-17-08(B)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. This facility is located in Perry County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the location and color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

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

(2) The permittee shall collect and record the following information each day for each emissions unit:

- a. the company name and identification number of each resin employed;
- b. the number of gallons of each resin employed;
- c. the OC content of each resin employed, in pounds per gallon, as applied;
- d. the total potential (prior to applying the forming operations /oven “split”) daily OC emissions rate for all resins, in pounds;



- i. For purposes of calculating the organic compound emission rates for these emissions units (P002, P003, P005, P007-P045) and the associated oven (P001), the permittee shall utilize a value of 94.1% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5.9% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of organic compound emissions between this emissions unit and the associated oven is based upon the material balance information provided by the company (January 2006 compliance stack test conducted on Curing Oven #2 at Vanceburg, KY).
- e. the total daily emissions attributed to this emissions unit;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly OC emissions rate for all resins, i.e., the sum of d)(2)(e) divided by d)(2)(f), in pounds per hour (average).

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

- (3) The permit-to-install (PTI) application for these emissions units was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Ohio's Air Toxic Policy" was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.



- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Styrene

TLV (mg/m<sup>3</sup>): 85.20

Maximum Hourly Emission Rate (lbs/hr): 1.67

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 271.3

MAGLC (ug/m<sup>3</sup>): 2,028.63

The permittee, has demonstrated that emissions of Styrene, from emissions units P002, P003, P005, P007-P045, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114-01, and ORC 3704.03(F))*

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and



- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Ohio's Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Ohio's Air Toxic Policy", has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114-01, and ORC 3704.03(F))*

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Ohio's Air Toxic Policy":
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Ohio's Air Toxic Policy";
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Ohio's Air Toxic Policy", initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Ohio's Air Toxic Policy", and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114-01, and ORC 3704.03(F))*



- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Ohio's Air Toxic Policy", through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114-01, and ORC 3704.03(F))*

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

- (2) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible emissions of fugitive dust were observed from this emissions unit; and
- b. any corrective actions taken to eliminate the visible 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.

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. an identification of each hour during which the organic compound emissions exceeded 2.79 pounds per hour, and the actual organic compound emissions for each such hour.

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

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

- (4) The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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



- (5) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
- a. the original model input;
  - b. the updated model input;
  - c. the reason for the change(s) to the input parameter(s); and
  - d. a summary of the results of the updated modeling, including the input changes; and
  - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

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

f) Testing Requirements

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

- a. Emissions Limitation:

OC emissions shall not exceed 2.79 pounds per hour and 12.23 tons per year.

Applicable Compliance Method:

Compliance with the pounds per hour emissions limitation shall be demonstrated by the recordkeeping in d)(2).

The hourly OC limitation was established for PTI purposes to reflect the emissions unit's potential to emit using the following formula:

Emission factor: 830.299 lbs OC/ton binder

$(830.299 \text{ lbs OCs/ton of binder})(7.15 \text{ lbs/hr max binder feed rate})(94.1\% \text{ split of OCs emitted from forming drums}) / 2,000 \text{ lbs/ton} = 2.79 \text{ lbs OC/hr}$

[Note that the 5.9% emissions split for the oven and 94.1% emissions split for the forming drums comes from the January 26, 2006 stack test at the Vanceburg, KY plant]

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 emissions limitation shall be determined by adding the daily OC emissions, as recorded in d)(2)e., for each day in the calendar year, and divided by 2,000 lbs/ton.

*(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))*

b. Emissions Limitation:

PE shall not exceed 0.66 pound per hour and 2.9 tons per year.

Applicable Compliance Method:

Compliance with the pound per hour emission limitation shall be demonstrated based on the following calculations based on the information presented in the permittee's application:

The hourly PE limitation was established for PTI purposes to reflect the emissions unit's potential to emit using the following formula:

$$(66.14\% \text{ of solids content/ton of binder})(2,000 \text{ lbs/ton})(1-0.86 \text{ transfer efficiency}) = 185.192 \text{ lbs PE/ton of binder}$$

Emission factor: 185.192 lbs PE/ton of binder

$$(185.192 \text{ lbs PE/ton of binder})(7.15 \text{ lbs/hr max binder feed rate}) / 2,000 \text{ lbs/ton} = 0.66 \text{ lb PE/hr}$$

If required, particulate emissions shall be determined according to test Methods 1 - 5, 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 ton per year emission limitation shall be determined based on the following calculation:

$$\begin{aligned} \text{PE (tpy)} &= 0.66 \text{ lb PE/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \\ &= 2.9 \text{ tons per year} \end{aligned}$$

*(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))*

c. Emissions Limitation:

There shall be no visible PE from this emissions unit.



**Preliminary Proposed Title V Permit**

Superior Fibers Shawnee LLC

**Permit Number:** P0090271

**Facility ID:** 0664000067

**Effective Date:** To be entered upon final issuance

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

*(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))*

g) Miscellaneous Requirements

(1) None.