

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install: **14-05908**

**A. Source Description**

The proposed emissions units will use four trains to produce anti-foaming agents for various industries. Some products are largely water based, others oil based. Surfactants, waxes, silica, and other additives are blended and /or homogenized into the base for anti-foaming properties. Components may be solid or liquid when introduced to the mixers.

**B. Facility Emissions and Attainment Status**

Emerald Hilton Davis is a Title V facility based upon potential emissions of sulfur dioxide and organic compounds. The facility is located in Hamilton County which is designated as attainment for all criteria pollutants except ozone and particulate matter 2.5 microns and less in diameter. The facility is currently a synthetic minor for hazardous air pollutants (HAPs), established with air Permit to Install (PTI) number 14-05390 issued June 17, 2003.

**C. Source Emissions**

Potential HAP emissions from the proposed emissions units are very small, as three potential raw material components may contain up to 5% by weight either methanol or formaldehyde (both listed HAPs). The company stated potential is 0.004 tons per year for each foam control train.

**D. Conclusion**

This facility is currently a synthetic minor for HAPs with the federally enforceable limits as established in air PTI number 14-05390 as issued in final June 17, 2003. Because the proposed emissions units in this permit would have the potential to emit quantities of HAPs, it is proposed that these emissions units be included in the record keeping and reporting requirements for the facility to maintain minor HAP status.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
HAMILTON COUNTY**

**CERTIFIED MAIL**

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**Application No:** 14-05908

**Fac ID:** 1431070039

**DATE:** 6/26/2007

Emerald Hilton Davis LLC  
Tracy Wright  
2235 Langdon Farm Road  
Cincinnati, OH 45237-4790

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$3750** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

KY

IN  
**HAMILTON  
COUNTY**

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05908** FOR AN AIR CONTAMINANT SOURCE

**FOR Emerald Hilton Davis LLC**

On 6/26/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Emerald Hilton Davis LLC**, located at **2235 Langdon Farm Road, Cincinnati Ohio**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05908:

**Four Foam Control Additive Manufacturing Processes.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy, Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 14-05908**

Application Number: 14-05908  
Facility ID: 1431070039  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Emerald Hilton Davis LLC  
Person to Contact: Tracy Wright  
Address: 2235 Langdon Farm Road  
Cincinnati, OH 45237-4790

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2235 Langdon Farm Road  
Cincinnati Ohio, Ohio**

Description of proposed emissions unit(s):  
**Four Foam Control Additive Manufacturing Processes.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

**Emerald Hilton Davis LLC**

**Facility ID: 1431070039**

**PTI Application: 14-05908**

**Issued: To be entered upon final issuance**

**Part I - GENERAL TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit-To-Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

**Emerald Hilton Davis LLC**  
**PTI Application: 14-05908**

**Facility ID: 1431070039**

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

**2. Scheduled Maintenance/Malfunction Reporting**

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

**3. Risk Management Plans**

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

**4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain,

**Emerald Hilton Davis LLC**  
**PTI Application: 14-05908**

**Facility ID: 1431070039**

**Issued: To be entered upon final issuance**

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.

**5. 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.

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**Emerald Hilton Davis LLC**

**Facility ID: 1431070039**

**PTI Application: 14-05908**

**Issued: To be entered upon final issuance**

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**Emerald Hilton Davis LLC**  
**PTI Application: 14-05908**

**Facility ID: 1431070039**

**Issued: To be entered upon final issuance**

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. 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.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. 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 appropriate Ohio EPA District Office or local air agency 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

**Emerald Hilton Davis LLC**  
**PTI Application: 14-05908**

**Facility ID: 1431070039**

**Issued: To be entered upon final issuance**

the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. 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.

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

## **11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

## **12. 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.

**Emerald Hilton Davis LLC**

**Facility ID: 1431070039**

**PTI Application: 14-05908**

**Issued: To be entered upon final issuance**

**13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

**Emerald Hilton Davis LLC**  
**PTI Application: 14-05908**

**Facility ID: 1431070039**

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Permit-To-Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

**Emerald Hilton Davis LLC**  
**PTI Application: 14-05908**

**Facility ID: 1431070039**

**Issued: To be entered upon final issuance**

installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. Public Disclosure**

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

**7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**Emerald Hilton Davis LLC**

**Facility ID: 1431070039**

**PTI Application: 14-05908**

**Issued: To be entered upon final issuance**

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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 (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**Emerald Hilton Davis LLC****Facility ID: 1431070039****PTI Application: 14-05908****Issued: To be entered upon final issuance****C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	21.4
PE	12.1
PM10	12.1
PM2.5	12.1
Single HAP	9.9
Combined HAPs	24.9

**Emerald Hilton Davis LLC**  
**PTI Application: 14-05908**

**Facility ID: 1431070039**

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment -(P508) - Foam Control Additive Manufacturing Train No. 1**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63	See term and condition A.I.2.a.
ORC 3704.03(T)(4)	See term and condition A.I.2.b.
OAC rule 3745-17-07(A)(1)	See term and condition A.I.2.c.
OAC rule 3745-17-07(B)(1)	See term and condition A.I.2.d.
OAC rule 3745-17-11(B)	See term and condition A.I.2.e.
OAC rule 3745-17-08(B)(3)	See terms and conditions A.I.2.f and A.I.2.g.
OAC rule 3745-21-07(G)(2)	Exempt, due to Ohio Supreme Court decision of July 11, 2001 and the Ohio EPA permitting call held July 18, 2002.

**2. Additional Terms and Conditions**

- 2.a The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B001 (Dow Therm Heaters), F001 (Coal Handling 09-I), F002 (Fly Ash Handling 09-I), B007 (37.2 mmBtu/hr natural gas-fired boiler), B009 (90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone), B010 (90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone), P154 (wastewater pretreatment (plantwide) controlled with Carbon adsorption system), P159 (Wastewater Pretreatment 52-II), P160 (Packout 41-I), P168 (Packout 41-II), P172 (Sizing, Packing Food Colors 01-I), P173 (Sizing, Packing Food Colors 02-II), P174 (Packout 10-I), P175 (Dye Reaction 06-I), P177 (Pigment Packout 08-I), P178 (Pigment Packout 08-II), P179 (Boiler 40-I), P180 (Food Color Packaging 40-I), P181 ((Dye Filtration 36-I), P184 (Granularizing Food Colors 01-I), P187 (Pigment Flushing 39-I), P188 (Dye Drying 21-II), P189 (Pigment Salt Milling 39-I), P190 (Dye Blending 10-I), P193 (Dye Material Handling and Packout 14-I), P194 (Pigment Flushing 10-V), P200 (Dye Drying 41-I), P207 (Dye Drying 41-

Emissions Unit ID: P508

II), P208 (Dye Drying 41-III), P209 (Seal Water Cooling 41-I), P215 (Dye Drying 21-I), P222 (Dye Grinding and Blending 41-I), P223 (Dye Reaction 36-I), P224 (Dye Reaction 36-II), P225 (Dye Reaction 36-III), P226 (Dye Reaction 36-IV), P227 (Condensate Recovery 36-I), P228 (Mother Liquor Handling 36-I), P229 (Wash Preparation 36-I), P230 (Dye Reaction 36-VI), P231 (Dye Reaction 36-VII), P232 (Dye Reaction 36-X), P233 (Dye Salting 36-I), P234 (Dye Slurry Holding 36-I), P237 (Dye Mixing and Milling 36-II), P238 (Dye Blending 36-I), P240 (Dye Reaction 36-IX), P241 (Dye Reaction 36-V), P242 (Condensate Recovery 36-II), P243 (Dye Reaction 36-VIII), P245 (Dye Reaction 20-I), P246 (Tray Drying 10-I), P249 (Tray Drying 10-II), P250 (Dye Reaction 10-I), P251 (Dye Clarification 20-I), P261 (Tray Drying 10-III), P263 (Tray Drying 10-IV), P266 (Tray Drying 10-V), P282 (Packout 21-I), P284 (Dye Drying 14-I), P295 (Dye Mfg. 12-I), P296 (Dye Reaction 12-I), P297 (Tray Drying 08-I), P313 (Dye Reaction 12-II), P314 (Dye Reaction 12-III), P315 (Separation/Filtration 12-I), P316 (Dry Reaction 12-IV), P317 (Dye Sulfonation 12-XIV), P318 (Dye Sulfonation 12-XV), P319 (Dye Sulfonation 12-I), P320 (Dye Sulfonation 12-II), P321 (Dye Sulfonation 12-III), P322 (Dye Sulfonation 12-IV), P323 (Dye Sulfonation 12-V), P324 (Dye Sulfonation 12-VI), P325 (Dye Sulfonation 12-VII), P326 (Dye Sulfonation 12-VIII), P327 (Dye Sulfonation 12-IX), P328 (Dye Sulfonation 12-X), P329 (Dye Sulfonation 12-XI), P330 (Dye Sulfonation 12-XII), P331 (Dye Sulfonation 12-XIII), P332 (Separation/Filtration 12-II), P333 (Separation/Filtration 12-IV), P334 (Separation/Filtration 12-V), P335 (Pigment Mfg. 12-II), P336 (Separation/Filtration 12-VII), P337 (Separation/Filtration 12-VIII), P338 (Pigment Mfg. 12-I), P339 (Dye Mfg. 12-II), P340 (Dye Mfg. 12-V), P341 (Dye Mfg. 12-VI), P342 (Dye Reaction 12-III), P343 (Dye Mfg. 12-III), P344 (Dye Mfg. 12-IV), P345 (Dye Mfg. 12-V), P346 (Dye Mfg. 12-VI), P347 (Dye Mfg. 12-VII), P348 (Dye Mfg. 12-VIII), P349 (Dye Mfg. 12-IX), P350 (Pigment Milling 12-I), P351 (Dye Reaction 12-VIII), P352 (Dye Mfg. XI), P353 (Separation/Filtration 12-X), P354 (Separation/Filtration 12-XI), P355 (Separation/Filtration 12 XII), P356 (Pigment Milling 12-II), P357 (Separation/Filtration 12-XIV), P358 (Dye Mfg. 12-XIII), P359 (Separation/Filtration 12-12-XV), P360 (Dye Mfg. 12-XIII), P361 (Dye Mfg. 12 XIV), P362 (Dye Mfg. 12-XV), P363 (Tray Drying 08-II), P364 (Tray Drying 08-III), P365 (Tray Drying 08-V), P366 (Vacuum Drying 08-I), P367 (Pigment Mfg. 08-I), P368 (Pigment Mfg. 08-II), P369 (Pigment Mfg. 08-III), P370 (Pigment Mfg. 08-IV), P371 (Diazo Pigment Reaction 08-II), P372 (Diazo Pigment Reaction 08-I), P373 (Grinding Blending), Packing Dyes 08-I), P374 (Grinding Blending), Packing Dyes 08-II), P379 (Varnish and Misc. Reaction 12-I), P380 (Varnish Mfg. 12-I), P381 (Varnish and Misc. Reaction 13-II), P382 (Varnish and Misc. Reaction 13-III), P383 (Packout 01-I), P384 (Packout 02-I), P385 (Tray Drying 02-I), P386 (Tray Drying 02-II), P387 (Food Color Mfg. 02-I), P388 (Tray Drying 01-I), P389 (Vacuum Drying 01-I), P390 (Spray Drying 02-I), P391 (Drum Drying Food Colors 020I), P392 (Liquid Color Solutions 02-I), P393 (Pilot Plant Reaction 35-I), P394 (Pilot Plant Reaction 35-II), P395 (Pilot Plant Vacuum Tray Drying 35-I), P396 (Pilot Plant Reaction 35-VI), P397 (Pilot Plant Vacuum Drying 35-I), P398 (Pilot Plant Tray Drying 35-I), P399 (Sizing,

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Packing Food Colors 02-III), P400 (Sizing, Packing Food Colors 02-II), P401 (Varnish and Misc. Reaction 13-IV), P402 (Pilot Plant Reaction 35-VIII), P403 (Pilot Plant Reaction 35-IX), P404 (Pilot Plant Reaction 35-X), P405 (Grinding, Blending, Packing Dyes 08-I), P406 (Grinding, Blending, Packing Dyes 08-II), P407 (Grinding, Packing Pigments 08-I), P408 (Pigment Filtration 08-I), P409 (Pigment Flushing 10-I), P410 (Pigment Flushing 10-II), P411 (Pigment Flushing 10-III), P412 (Pigment Flushing 10-IV), P413 (Pigment Flushing 10-VI), P414 (Pigment Flushing 10-VII), P415 (Pigment Flushing 10-VIII), P416 (Pigment Flushing 10-IX), P417 (Pigment Flushing 10-X), P418 (Pigment Flushing 10-XI), P419 (Pigment Flushing 10-XII), P420 (Pigment Flushing 10-XIII), P421 (Pigment Flushing 10-V), P422 (Spray Drying Food Colors), P423 (Pigment Dispersing 10-I), P424 (Pigment Milling 12-III), P425 (Separation/Filtration 12-XVII), P426 (Separation/Filtration 12-IX), P427 (Dye Mfg.12-XVII), P428 (Dye Mfg. 12-XVIII), P429 (Dye Mfg. 12-XIX), P430 (Pigment Mfg. 08-VI), P431 (Pigment Mfg. 08-VII), P432 (Pigment Mfg. 08-VIII), P433 (Pigment Mfg. 08-IX), P434 (Pigment Mfg. 08-X), P435 (Pigment Mfg. 08-XI), P436 (Pigment Mfg. 08-XII), P437 (Pigment Mfg. 08-XIII), P438 (Pigment Mfg. 08-XIV), P439 (Pigment Mfg. 08-XV), P441 (Pigment Mfg. 12-III), P442 (Pigment Mfg. 12-IV), P443 (Pigment Mfg. 12-V), P444 (Pigment Mfg. 12-VI), P445 (Pigment Mfg. 12-VII), P446 (Pigment Mfg. 12-VIII), P447 (Pigment Mfg. 12-IX), P448 (Pigment Mfg. 12-X), P449 (Pigment Mfg. 12-XI), P450 (Pigment Mfg. 12-XII), P451 (Pigment Mfg. 12-XIII), P452 (Pigment Mixing 12-III), P453 (Pigment Mixing 12-1), P454 (Pigment Mixing 12-II), P455 (Pigment Dispersion 12-I), P456 (Pigment Dispersion 12- II), P457 (Liquid Color Solutions 02-II), P459 (Tank TF-XXV), P460 (Tank 14-VIII), P461 (Pigment Dispersion 12-IV), P462 (Milled Pigments), P466 (Grinding/ Blending 21-I), P467 (Pigment Mfg. 12-XV), P468 ((Pigment Mfg. 12-XVI), P469 ( Solvent Storage 12-I), P470 (FD&C Lakes Blending), P473 (Pigment Mfg. 12-XVII), P474 (Pigment Mfg. 12-XVIII), P475 (Pigment Mfg. 12-XIX), P476 ( Ball Mill A), P477 (Ball Mill B), P478 (Ball Mill C), P479 (Ball Mill D), P480 (Ball Mill E), P481 (Ball Mill F), P482 (Ball Mill G), P483 (Ball Mill L), P484 (High Speed Disperser 1), P485 (High Speed Disperser 2), P486 (High Speed Disperser 3), P487 (High Speed Disperser 4), P488 (High Speed Disperser 5), P489 (High Speed Disperser 6), P490 (High Speed Disperser 7), P491 (High Speed Disperser 8), P492 (High Speed Disperser 9), P493 (High Speed Disperser 10), P494 (High Speed Disperser 11), P495 (Drais Mill 1 DR), P496 (Drais Mill 2 DR), P497 (Drais Mill 3 DR), P498 (Drais Mill 4 DR), P499 (Pony Mixer 1), P500 (Double Post Mixer), P501 (Pony Mixer 3), P502 (Roll Mill 1), P503 (Roll Mill 2), P504 (Roll Mill 3), P505 (Roll Mill 4), P506 (Roll Mill 5), P507 (Roll Mill 6)T002 (Tank 14-III), T006 (Tank 54-I), T013 (Tank 12-IV), T014 (Tank 12-III), T015 (Tank 03-I), T020 (Tank 41-VI), T023 (Tank 13-I), T024 (Tank 13-II), T025 (Tank 13-III), T026 (Tank 13-

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IV), T027 (Tank 13-V), T028 (Tank 13-IX), T029 (Tank 13-VII), T030 (Tank 13-VIII), T035 (Tank 20-XIII), T037 (Tank 20-XV), T038 (Tank 20-X), T039 (Tank 20-XII), T042 (Tank 54-II), T047 (Tank 21-IV), T055 (Tank TF-XX), T056 (Tank TF-XXI), T061 (Tank TF-VIII), T066 (Tank TF-XIII), T067 (Tank 21-II), T069 (Tank 36-VII), T070 (Tank 36-V), T073 (Tank 36-VI), T077 (Tank 24-1), T078 (Tank 09-I), T079 (Tank TF-II), T080 (Tank TF-V), T081 (Tank TF-VI), T082 (Tank TF-VII), T085 (Tank 21-VI), T087 (Tank TF-I), T088 (Tank TF-IX), T089 (Tank TF-X), T090 (Tank TF-XII), T091 (Tank 21-III), T092 (Tank 14-V), T093 (Tank 21-I), T094 (Tank 14-I), T095 (Tank 54-III), T096 (Tank 14-IV), T097 (Tank 20-V), T098 (Tank 41-II), T099 (Tank 41-III), T100 (Tank 41-IV), T101 (Tank 41-V), T102 (Tank 41-VII), T103 (Tank 41-VIII), T104 (Tank 41-IX), T105 (Tank TF-XXIV), T106 (Tank TF-XXVI), T107 (Tank TF-XXVII), T108 (Tank 20-XVII), T109 (Tank 54-IV), T110 (Tank 14-VI), T111 (Tank 14-VII), T112 (Tank 20-I), T113 (Tank TF-XVIII), T114 (Tank 20-II), T115 (Tank TF-XXII), T116 (Tank 36-I), T117 (Tank 21-V), T118 (Tank 41-V), and T119 (Tank 36-IV), including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and permanent exemption air contaminant sources shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month emissions limitation upon issuance of the permit.

- 2.b** The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC), particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10) and particulate matter emissions 2.5 microns and less in diameter (PM2.5) from this air contaminant source since the potential to emit for VOC, PE, PM10 and PM2.5 is less than 10.0 TPY.
- 2.c** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.d** The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
- 2.e** The PE from the outlet of the fabric filter controlling this emissions unit shall not exceed 0.903 pound per hour based on Table I in OAC rule 3745-17-11(B).
- 2.f** The particulate emission rate at the control device outlet shall not exceed 0.030

Emissions Unit ID: P508

grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

- 2.g** The fugitive dust from this emissions unit shall be controlled by the use of reasonably available control measures adequate to minimize or eliminate visible particulate emissions.
- 2.h** The hourly PE limitation outlined in term A.2.e is based upon the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation.

## **II. Operational Restrictions**

None

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.a of this permit:
  - a. The name and identification number of each liquid material.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each liquid material.
  - c. The total combined HAP content of each liquid material [sum all the individual HAP contents from (b)].
  - d. The number of gallons transferred of each liquid material.
  - e. The total individual HAP emissions for each HAP from all liquid materials, in pounds or tons per month.
  - f. The total combined HAP emissions from all liquid materials, in pounds or tons per month [sum of all individual HAP emissions in (e)].
  - g. The updated rolling, 12-month summation of individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation of total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental

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Services contact. This information does not have to be kept on a individual emissions unit basis.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

**IV. Reporting Requirements**

1. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emissions limitation for the emission units identified in term and condition A.2.a. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
2. The permittee shall submit semiannual written reports that (a) identify all days during

Emissions Unit ID: P508

which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate emissions and/or visible fugitive dust 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 periods.

## V. Testing Requirements

1. Compliance with the emission, hour and usage limitations in terms and conditions A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The PE from the outlet of the fabric filter controlling emission unit P508 shall not exceed 0.903 pounds per hour.

Applicable Compliance Method:

The hourly PE emission rate is based on Table 1 in OAC rule 3745-17-11. The actual emissions shall be calculated by: [(production rate in pounds per hour) x (% dry material)x (1.1 to account for PM content variability) x (1.0% AP-42 emission factor) / 24 hours per batch].

- b. Emission Limitation:

The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

Applicable Compliance Method:

Compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas shall be calculated by: [(production rate in pounds per hour) x (% dry material) x (1.1 to account for PM content variability) x (1.0% AP-42 emission factor) / 24 hours per batch x {(95% capture efficiency) x (1-99% control efficiency)} x 7000 grain/ pound of PE / airflow in dry standard cubic feet per hour.]

- c. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emission units listed in section A.2.b.

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Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.I.2.a shall be demonstrated by the record keeping requirements specified in section A.III.1.

d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

f. Emission Limitation:

The uncontrolled potential to emit for PE, PM10 and PM2.5 is less than ten tons per year.

Applicable Compliance Method:

The annual PE-PM10-PM2.5 emission rate is based on this emission unit's uncontrolled potential to emit. The annual PE-PM10-PM2.5 emission rate was calculated by:  $[(\text{production rate in pounds per hour}) \times (\% \text{ dry material}) \times (1.1 \text{ to account for PM content variability}) \times (1.0\% \text{ AP-42 emission factor}) / 24 \text{ hours per batch} \times 8760 \text{ hours per year} / 2000 \text{ pounds per ton}]$ .

Emissions Unit ID: P508

## g. Emission Limitation:

Volatile Organic Compound (VOC) emissions from this emissions unit is less than ten tons per year.

## Applicable Compliance Method:

The hourly VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by:  $[(\text{production rate in pounds per hour}) \times (\text{VOC content}) \times (1.1 \text{ to account for OC content variability}) \times (1.5\% \text{ AP-42 emission factor}) / 24 \text{ hours per batch} \times 8760 \text{ hours per year} / 2000 \text{ pounds per ton}]$ .

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment -(P508) - Foam Control Additive Manufacturing Train No. 1**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as

Emissions Unit ID: P508

**Issued: To be entered upon final issuance**

defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P509) - Foam Control Additive Manufacturing Train No. 2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63	See term and condition A.I.2.a.
ORC 3704.03(T)(4)	See term and condition A.I.2.b.
OAC rule 3745-17-07(B)(1)	See term and condition A.I.2.c.
OAC rule 3745-17-07(B)(1)	See term and condition A.I.2.d.
OAC rule 3745-17-11(B)	See term and condition A.I.2.e.
OAC rule 3745-17-08(B)(3)	See terms and conditions A.I.2.f and A.I.2.g.
OAC rule 3745-21-07(G)(2)	Exempt, due to Ohio Supreme Court decision of July 11, 2001 and the Ohio EPA permitting call held July 18, 2002.

**2. Additional Terms and Conditions**

- 2.a The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B001 (Dow Therm Heaters), F001 (Coal Handling 09-I), F002 (Fly Ash Handling 09-I), B007 (37.2 mmBtu/hr natural gas-fired boiler), B009 (90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone), B010 (90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone), P154 (wastewater pretreatment (plantwide) controlled with Carbon adsorption system), P159 (Wastewater Pretreatment 52-II), P160 (Packout 41-I), P168 (Packout 41-II), P172 (Sizing, Packing Food Colors 01-I), P173 (Sizing, Packing Food Colors 02-II), P174 (Packout 10-I), P175 (Dye Reaction 06-I), P177 (Pigment Packout 08-I), P178 (Pigment Packout 08-II), P179 (Boiler 40-I), P180 (Food Color Packaging 40-I),

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P181 ((Dye Filtration 36-I), P184 (Granularizing Food Colors 01-I), P187 (Pigment Flushing 39-I), P188 (Dye Drying 21-II), P189 (Pigment Salt Milling 39-I), P190 (Dye Blending 10-I), P193 (Dye Material Handling and Packout 14-I), P194 (Pigment Flushing 10-V), P200 (Dye Drying 41-I), P207 (Dye Drying 41-II), P208 (Dye Drying 41-III), P209 (Seal Water Cooling 41-I), P215 (Dye Drying 21-I), P222 (Dye Grinding and Blending 41-I), P223 (Dye Reaction 36-I), P224 (Dye Reaction 36-II), P225 (Dye Reaction 36-III), P226 (Dye Reaction 36-IV), P227 (Condensate Recovery 36-I), P228 (Mother Liquor Handling 36-I), P229 (Wash Preparation 36-I), P230 (Dye Reaction 36-VI), P231 (Dye Reaction 36-VII), P232 (Dye Reaction 36-X), P233 (Dye Salting 36-I), P234 (Dye Slurry Holding 36-I), P237 (Dye Mixing and Milling 36-II), P238 (Dye Blending 36-I), P240 (Dye Reaction 36-IX), P241 (Dye Reaction 36-V), P242 (Condensate Recovery 36-II), P243 (Dye Reaction 36-VIII), P245 (Dye Reaction 20-I), P246 (Tray Drying 10-I), P249 (Tray Drying 10-II), P250 (Dye Reaction 10-I), P251 (Dye Clarification 20-I), P261 (Tray Drying 10-III), P263 (Tray Drying 10-IV), P266 (Tray Drying 10-V), P282 (Packout 21-I), P284 (Dye Drying 14-I), P295 (Dye Mfg. 12-I), P296 (Dye Reaction 12-I), P297 (Tray Drying 08-I), P313 (Dye Reaction 12-II), P314 (Dye Reaction 12-III), P315 (Separation/Filtration 12-I), P316 (Dry Reaction 12-IV), P317 (Dye Sulfonation 12-XIV), P318 (Dye Sulfonation 12-XV), P319 (Dye Sulfonation 12-I), P320 (Dye Sulfonation 12-II), P321 (Dye Sulfonation 12-III), P322 (Dye Sulfonation 12-IV), P323 (Dye Sulfonation 12-V), P324 (Dye Sulfonation 12-VI), P325 (Dye Sulfonation 12-VII), P326 (Dye Sulfonation 12-VIII), P327 (Dye Sulfonation 12-IX), P328 (Dye Sulfonation 12-X), P329 (Dye Sulfonation 12-XI), P330 (Dye Sulfonation 12-XII), P331 (Dye Sulfonation 12-XIII), P332 (Separation/Filtration 12-II), P333 (Separation/Filtration 12-IV), P334 (Separation/Filtration 12-V), P335 (Pigment Mfg. 12-II), P336 (Separation/Filtration 12-VII), P337 (Separation/Filtration 12-VIII), P338 (Pigment Mfg. 12-I), P339 (Dye Mfg. 12-II), P340 (Dye Mfg. 12-V), P341 (Dye Mfg. 12-VI), P342 (Dye Reaction 12-III), P343 (Dye Mfg. 12-III), P344 (Dye Mfg. 12-IV), P345 (Dye Mfg. 12-V), P346 (Dye Mfg. 12-VI), P347 (Dye Mfg. 12-VII), P348 (Dye Mfg. 12-VIII), P349 (Dye Mfg. 12-IX), P350 (Pigment Milling 12-I), P351 (Dye Reaction 12-VIII), P352 (Dye Mfg. XI), P353 (Separation/Filtration 12-X), P354 (Separation/Filtration 12-XI), P355 (Separation/Filtration 12 XII), P356 (Pigment Milling 12-II), P357 (Separation/Filtration 12-XIV), P358 (Dye Mfg. 12-XIII), P359 (Separation/Filtration 12-12-XV), P360 (Dye Mfg. 12-XIII), P361 (Dye Mfg. 12 XIV), P362 (Dye Mfg. 12-XV), P363 (Tray Drying 08-II), P364 (Tray Drying 08-III), P365 (Tray Drying 08-V), P366 (Vacuum Drying 08-I), P367 (Pigment Mfg. 08-I), P368 (Pigment Mfg. 08-II), P369 (Pigment Mfg. 08-III), P370 (Pigment Mfg. 08-IV), P371 (Diazo Pigment Reaction 08-II), P372 (Diazo Pigment Reaction 08-I), P373 (Grinding Blending), Packing Dyes 08-I), P374 (Grinding

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Blending), Packing Dyes 08-II), P379 (Varnish and Misc. Reaction 12-I), P380 (Varnish Mfg. 12-I), P381 (Varnish and Misc. Reaction 13-II), P382 (Varnish and Misc. Reaction 13-III), P383 (Packout 01-I), P384 (Packout 02-I), P385 (Tray Drying 02-I), P386 (Tray Drying 02-II), P387 (Food Color Mfg. 02-I), P388 (Tray Drying 01-I), P389 (Vacuum Drying 01-I), P390 (Spray Drying 02-I), P391 (Drum Drying Food Colors 020I), P392 (Liquid Color Solutions 02-I), P393 (Pilot Plant Reaction 35-I), P394 (Pilot Plant Reaction 35-II), P395 (Pilot Plant Vacuum Tray Drying 35-I), P396 (Pilot Plant Reaction 35-VI), P397 (Pilot Plant Vacuum Drying 35-I), P398 (Pilot Plant Tray Drying 35-I), P399 (Sizing, Packing Food Colors 02-III), P400 (Sizing, Packing Food Colors 02-II), P401 (Varnish and Misc. Reaction 13-IV), P402 (Pilot Plant Reaction 35-VIII), P403 (Pilot Plant Reaction 35-IX), P404 (Pilot Plant Reaction 35-X), P405 (Grinding, Blending, Packing Dyes 08-I), P406 (Grinding, Blending, Packing Dyes 08-II), P407 (Grinding, Packing Pigments 08-I), P408 (Pigment Filtration 08-I), P409 (Pigment Flushing 10-I), P410 (Pigment Flushing 10-II), P411 (Pigment Flushing 10-III), P412 (Pigment Flushing 10-IV), P413 (Pigment Flushing 10-VI), P414 (Pigment Flushing 10-VII), P415 (Pigment Flushing 10-VIII), P416 (Pigment Flushing 10-IX), P417 (Pigment Flushing 10-X), P418 (Pigment Flushing 10-XI), P419 (Pigment Flushing 10-XII), P420 (Pigment Flushing 10-XIII), P421 (Pigment Flushing 10-V), P422 (Spray Drying Food Colors), P423 (Pigment Dispersing 10-I), P424 (Pigment Milling 12-III), P425 (Separation/Filtration 12-XVII), P426 (Separation/Filtration 12-IX), P427 (Dye Mfg.12-XVII), P428 (Dye Mfg. 12-XVIII), P429 (Dye Mfg. 12-XIX), P430 (Pigment Mfg. 08-VI), P431 (Pigment Mfg. 08-VII), P432 (Pigment Mfg. 08-VIII), P433 (Pigment Mfg. 08-IX), P434 (Pigment Mfg. 08-X), P435 (Pigment Mfg. 08-XI), P436 (Pigment Mfg. 08-XII), P437 (Pigment Mfg. 08-XIII), P438 (Pigment Mfg. 08-XIV), P439 (Pigment Mfg. 08-XV), P441 (Pigment Mfg. 12-III), P442 (Pigment Mfg. 12-IV), P443 (Pigment Mfg. 12-V), P444 (Pigment Mfg. 12-VI), P445 (Pigment Mfg. 12-VII), P446 (Pigment Mfg. 12-VIII), P447 (Pigment Mfg. 12-IX), P448 (Pigment Mfg. 12-X), P449 (Pigment Mfg. 12-XI), P450 (Pigment Mfg. 12-XII), P451 (Pigment Mfg. 12-XIII), P452 (Pigment Mixing 12-III), P453 (Pigment Mixing 12-1), P454 (Pigment Mixing 12-II), P455 (Pigment Dispersion 12-I), P456 (Pigment Dispersion 12- II), P457 (Liquid Color Solutions 02-II), P459 (Tank TF-XXV), P460 (Tank 14-VIII), P461 (Pigment Dispersion 12-IV), P462 (Milled Pigments), P466 (Grinding/ Blending 21-I), P467 (Pigment Mfg. 12-XV), P468 ((Pigment Mfg. 12-XVI), P469 ( Solvent Storage 12-I), P470 (FD&C Lakes Blending), P473 (Pigment Mfg. 12-XVII), P474 (Pigment Mfg. 12-XVIII), P475 (Pigment Mfg. 12-XIX), P476 ( Ball Mill A), P477 (Ball Mill B), P478 (Ball Mill C), P479 (Ball Mill D), P480 (Ball Mill E), P481 (Ball Mill F), P482 (Ball Mill G), P483 (Ball Mill L), P484 (High Speed Disperser 1), P485 (High Speed Disperser 2), P486 (High Speed Disperser 3), P487 (High Speed Disperser 4), P488 (High Speed

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Disperser 5), P489 (High Speed Disperser 6), P490 (High Speed Disperser 7), P491 (High Speed Disperser 8), P492 (High Speed Disperser 9), P493 (High Speed Disperser 10), P494 (High Speed Disperser 11), P495 (Drais Mill 1 DR), P496 (Drais Mill 2 DR), P497 (Drais Mill 3 DR), P498 (Drais Mill 4 DR), P499 (Pony Mixer 1), P500 (Double Post Mixer), P501 (Pony Mixer 3), P502 (Roll Mill 1), P503 (Roll Mill 2), P504 (Roll Mill 3), P505 (Roll Mill 4), P506 (Roll Mill 5), P507 (Roll Mill 6) T002 (Tank 14-III), T006 (Tank 54-I), T013 (Tank 12-IV), T014 (Tank 12-III), T015 (Tank 03-I), T020 (Tank 41-VI), T023 (Tank 13-I), T024 (Tank 13-II), T025 (Tank 13-III), T026 (Tank 13-IV), T027 (Tank 13-V), T028 (Tank 13-IX), T029 (Tank 13-VII), T030 (Tank 13-VIII), T035 (Tank 20-XIII), T037 (Tank 20-XV), T038 (Tank 20-X), T039 (Tank 20-XII), T042 (Tank 54-II), T047 (Tank 21-IV), T055 Tank TF-XX), T056 Tank TF-XXI), T061 Tank TF-VIII), T066 Tank TF-XIII), T067 (Tank 21-II), T069 (Tank 36-VII), T070 (Tank 36-V), T073 (Tank 36-VI), T077 (Tank 24-1), T078 (Tank 09-I), T079 (Tank TF-II), T080 (Tank TF-V), T081 (Tank TF-VI), T082 (Tank TF-VII), T085 (Tank 21-VI), T087 (Tank TF-I), T088 (Tank TF-IX), T089 (Tank TF-X), T090 (Tank TF-XII), T091 (Tank 21-III), T092 (Tank 14-V), T093 (Tank 21-I), T094 (Tank 14-I), T095 (Tank 54-III), T096 (Tank 14-IV), T097 (Tank 20-V), T098 (Tank 41-II), T099 (Tank 41-III), T100 (Tank 41-IV), T101 (Tank 41-V), T102 (Tank 41-VII), T103 (Tank 41-VIII), T104 (Tank 41-IX), T105 (Tank TF-XXIV), T106 (Tank TF-XXVI), T107 (Tank TF-XXVII), T108 (Tank 20-XVII), T109 (Tank 54-IV), T110 (Tank 14-VI), T111 (Tank 14-VII), T112 (Tank 20-I), T113 (Tank TF-XVIII), T114 (Tank 20-II), T115 (Tank TF-XXII), T116 (Tank 36-I), T117 (Tank 21-V), T118 (Tank 41-V), and T119 (Tank 36-IV), including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and permanent exemption air contaminant sources shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month emissions limitation upon issuance of the permit.

- 2.b** The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC), particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10) and particulate matter emissions 2.5 microns and less in diameter (PM2.5) from this air contaminant source since the potential to emit for VOC, PE, PM10 and PM2.5 is less than 10.0 TPY.
- 2.c** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Emissions Unit ID: P509

- 2.d** The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
- 2.e** The PE from the outlet of the fabric filter controlling this emissions unit shall not exceed 0.745 pound per hour based on Table I in OAC rule 3745-17-11(B).
- 2.f** The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.
- 2.g** The fugitive dust from this emissions unit shall be controlled by the use of reasonably available control measures adequate to minimize or eliminate visible particulate emissions.
- 2.h** The hourly PE limitation outlined in term A.2.e is based upon the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation.

## II. Operational Restrictions

None

**Issued: To be entered upon final issuance****III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.a of this permit:
  - a. The name and identification number of each liquid material.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each liquid material.
  - c. The total combined HAP content of each liquid material [sum all the individual HAP contents from (b)].
  - d. The number of gallons transferred of each liquid material.
  - e. The total individual HAP emissions for each HAP from all liquid materials, in pounds or tons per month.
  - f. The total combined HAP emissions from all liquid materials, in pounds or tons per month [sum of all individual HAP emissions in (e)].
  - g. The updated rolling, 12-month summation of individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation of total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

**IV. Reporting Requirements**

1. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emissions limitation for the emission units identified in term and condition A.2.a. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate emissions and/or visible fugitive dust 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 periods.

**V. Testing Requirements**

Emissions Unit ID: P509

1. Compliance with the emission, hour and usage limitations in terms and conditions A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The PE from the outlet of the fabric filter controlling emission unit P509 shall not exceed 0.745 pound per hour.

Applicable Compliance Method:

The hourly PE emission rate is based on Table 1 in OAC rule 3745-17-11. The actual emissions shall be calculated by: [(production rate in pounds per hour) x (% dry material) x (1.1 to account for PM content variability) x (1.0% AP-42 emission factor) / 24 hours per batch].

- b. Emission Limitation:

The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

Applicable Compliance Method:

Compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas shall be calculated by: [(production rate in pounds per hour) x (% dry material) x (1.1 to account for PM content variability) x (1.0% AP-42 emission factor) / 24 hours per batch x {(95% capture efficiency) x (1-99% control efficiency)} x 7000 grain/ pound of PE / airflow in dry standard cubic feet per hour.].

- c. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emission units listed in section A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.I.2.a shall be demonstrated by the record keeping requirements specified in section A.III.1.

- d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

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Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

f. Emission Limitation:

The uncontrolled potential to emit for PE, PM10 and PM2.5 is less than ten tons per year.

Applicable Compliance Method:

The annual PE-PM10-PM2.5 emission rate is based on this emission unit's uncontrolled potential to emit. The annual PE-PM10-PM2.5 emission rate was calculated by:  $[(\text{production rate in pounds per hour}) \times (\% \text{ dry material}) \times (1.1 \text{ to account for PM content variability}) \times (1.0\% \text{ AP-42 emission factor}) / 24 \text{ hours per batch} \times 8760 \text{ hours per year} / 2000 \text{ pounds per ton}]$ .

g. Emission Limitation:

Volatile Organic Compound (VOC) emissions from this emissions unit is less than ten tons per year.

Applicable Compliance Method:

The hourly VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by:  $[(\text{production rate in pounds per hour}) \times (\text{VOC content}) \times (1.1 \text{ to account for OC content variability}) \times (1.5\% \text{ AP-42 emission factor}) / 24 \text{ hours per batch} \times 8760 \text{ hours per year} / 2000 \text{ pounds per ton}]$ .

**Emerald Hilton Davis LLC**

**Facility ID: 1431070039**

Emissions Unit ID: P509

ton.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P509) - Foam Control Additive Manufacturing Train No. 2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply

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for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P510) - Foam Control Additive Manufacturing Train No. 3**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63	See term and condition A.I.2.a.
ORC 3704.03(T)(4)	See term and condition A.I.2.b.
OAC rule 3745-17-07(A)(1)	See term and condition A.I.2.c.
OAC rule 3745-17-07(B)(1)	See term and condition A.I.2.d.
OAC rule 3745-17-11(B)	See term and condition A.I.2.e.
OAC rule 3745-17-08(B)(3)	See terms and conditions A.I.2.f and A.I.2.g.
OAC rule 3745-21-07(G)(2)	Exempt, due to Ohio Supreme Court decision of July 11, 2001 and the Ohio EPA permitting call held July 18, 2002.

**2. Additional Terms and Conditions**

- 2.a The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B001 (Dow Therm Heaters), F001 (Coal Handling 09-I), F002 (Fly Ash Handling 09-I), B007 (37.2 mmBtu/hr natural gas-fired boiler), B009 (90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone), B010 (90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone), P154 (wastewater pretreatment (plantwide) controlled with Carbon adsorption system), P159 (Wastewater

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Pretreatment 52-II), P160 (Packout 41-I), P168 (Packout 41-II), P172 (Sizing, Packing Food Colors 01-I), P173 (Sizing, Packing Food Colors 02-II), P174 (Packout 10-I), P175 (Dye Reaction 06-I), P177 (Pigment Packout 08-I), P178 (Pigment Packout 08-II), P179 (Boiler 40-I), P180 (Food Color Packaging 40-I), P181 ((Dye Filtration 36-I), P184 (Granularizing Food Colors 01-I), P187 (Pigment Flushing 39-I), P188 (Dye Drying 21-II), P189 (Pigment Salt Milling 39-I), P190 (Dye Blending 10-I), P193 (Dye Material Handling and Packout 14-I), P194 (Pigment Flushing 10-V), P200 (Dye Drying 41-I), P207 (Dye Drying 41-II), P208 (Dye Drying 41-III), P209 (Seal Water Cooling 41-I), P215 (Dye Drying 21-I), P222 (Dye Grinding and Blending 41-I), P223 (Dye Reaction 36-I), P224 (Dye Reaction 36-II), P225 (Dye Reaction 36-III), P226 (Dye Reaction 36-IV), P227 (Condensate Recovery 36-I), P228 (Mother Liquor Handling 36-I), P229 (Wash Preparation 36-I), P230 (Dye Reaction 36-VI), P231 (Dye Reaction 36-VII), P232 (Dye Reaction 36-X), P233 (Dye Salting 36-I), P234 (Dye Slurry Holding 36-I), P237 (Dye Mixing and Milling 36-II), P238 (Dye Blending 36-I), P240 (Dye Reaction 36-IX), P241 (Dye Reaction 36-V), P242 (Condensate Recovery 36-II), P243 (Dye Reaction 36-VIII), P245 (Dye Reaction 20-I), P246 (Tray Drying 10-I), P249 (Tray Drying 10-II), P250 (Dye Reaction 10-I), P251 (Dye Clarification 20-I), P261 (Tray Drying 10-III), P263 (Tray Drying 10-IV), P266 (Tray Drying 10-V), P282 (Packout 21-I), P284 (Dye Drying 14-I), P295 (Dye Mfg. 12-I), P296 (Dye Reaction 12-I), P297 (Tray Drying 08-I), P313 (Dye Reaction 12-II), P314 (Dye Reaction 12-III), P315 (Separation/Filtration 12-I), P316 (Dry Reaction 12-IV), P317 (Dye Sulfonation 12-XIV), P318 (Dye Sulfonation 12-XV), P319 (Dye Sulfonation 12-I), P320 (Dye Sulfonation 12-II), P321 (Dye Sulfonation 12-III), P322 (Dye Sulfonation 12-IV), P323 (Dye Sulfonation 12-V), P324 (Dye Sulfonation 12-VI), P325 (Dye Sulfonation 12-VII), P326 (Dye Sulfonation 12-VIII), P327 (Dye Sulfonation 12-IX), P328 (Dye Sulfonation 12-X), P329 (Dye Sulfonation 12-XI), P330 (Dye Sulfonation 12-XII), P331 (Dye Sulfonation 12-XIII), P332 (Separation/Filtration 12-II), P333 (Separation/Filtration 12-IV), P334 (Separation/Filtration 12-V), P335 (Pigment Mfg. 12-II), P336 (Separation/Filtration 12-VII), P337 (Separation/Filtration 12-VIII), P338 (Pigment Mfg. 12-I), P339 (Dye Mfg. 12-II), P340 (Dye Mfg. 12-V), P341 (Dye Mfg. 12-VI), P342 (Dye Reaction 12-III), P343 (Dye Mfg. 12-III), P344 (Dye Mfg. 12-IV), P345 (Dye Mfg. 12-V), P346 (Dye Mfg. 12-VI), P347 (Dye Mfg. 12-VII), P348 (Dye Mfg. 12-VIII), P349 (Dye Mfg. 12-IX), P350 (Pigment Milling 12-I), P351 (Dye Reaction 12-VIII), P352 (Dye Mfg. XI), P353 (Separation/Filtration 12-X), P354 (Separation/Filtration 12-XI), P355 (Separation/Filtration 12 XII), P356 (Pigment Milling 12-II), P357 (Separation/Filtration 12-XIV), P358 (Dye Mfg. 12-XIII), P359 (Separation/Filtration 12-12-XV), P360 (Dye Mfg. 12-XIII), P361 (Dye Mfg. 12 XIV), P362 (Dye Mfg. 12-XV), P363 (Tray Drying 08-II), P364 (Tray Drying 08-

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III), P365 (Tray Drying 08-V), P366 (Vacuum Drying 08-I), P367 (Pigment Mfg. 08-I), P368 (Pigment Mfg. 08-II), P369 (Pigment Mfg. 08-III), P370 (Pigment Mfg. 08-IV), P371 (Diazo Pigment Reaction 08-II), P372 (Diazo Pigment Reaction 08-I), P373 (Grinding Blending), Packing Dyes 08-I), P374 (Grinding Blending), Packing Dyes 08-II), P379 (Varnish and Misc. Reaction 12-I), P380 (Varnish Mfg. 12-I), P381 (Varnish and Misc. Reaction 13-II), P382 (Varnish and Misc. Reaction 13-III), P383 (Packout 01-I), P384 (Packout 02-I), P385 (Tray Drying 02-I), P386 (Tray Drying 02-II), P387 (Food Color Mfg. 02-I), P388 (Tray Drying 01-I), P389 (Vacuum Drying 01-I), P390 (Spray Drying 02-I), P391 (Drum Drying Food Colors 020I), P392 (Liquid Color Solutions 02-I), P393 (Pilot Plant Reaction 35-I), P394 (Pilot Plant Reaction 35-II), P395 (Pilot Plant Vacuum Tray Drying 35-I), P396 (Pilot Plant Reaction 35-VI), P397 (Pilot Plant Vacuum Drying 35-I), P398 (Pilot Plant Tray Drying 35-I), P399 (Sizing, Packing Food Colors 02-III), P400 (Sizing, Packing Food Colors 02-II), P401 (Varnish and Misc. Reaction 13-IV), P402 (Pilot Plant Reaction 35-VIII), P403 (Pilot Plant Reaction 35-IX), P404 (Pilot Plant Reaction 35-X), P405 (Grinding, Blending, Packing Dyes 08-I), P406 (Grinding, Blending, Packing Dyes 08-II), P407 (Grinding, Packing Pigments 08-I), P408 (Pigment Filtration 08-I), P409 (Pigment Flushing 10-I), P410 (Pigment Flushing 10-II), P411 (Pigment Flushing 10-III), P412 (Pigment Flushing 10-IV), P413 (Pigment Flushing 10-VI), P414 (Pigment Flushing 10-VII), P415 (Pigment Flushing 10-VIII), P416 (Pigment Flushing 10-IX), P417 (Pigment Flushing 10-X), P418 (Pigment Flushing 10-XI), P419 (Pigment Flushing 10-XII), P420 (Pigment Flushing 10-XIII), P421 (Pigment Flushing 10-V), P422 (Spray Drying Food Colors), P423 (Pigment Dispersing 10-I), P424 (Pigment Milling 12-III), P425 (Separation/Filtration 12-XVII), P426 (Separation/Filtration 12-IX), P427 (Dye Mfg. 12-XVII), P428 (Dye Mfg. 12-XVIII), P429 (Dye Mfg. 12-XIX), P430 (Pigment Mfg. 08-VI), P431 (Pigment Mfg. 08-VII), P432 (Pigment Mfg. 08-VIII), P433 (Pigment Mfg. 08-IX), P434 (Pigment Mfg. 08-X), P435 (Pigment Mfg. 08-XI), P436 (Pigment Mfg. 08-XII), P437 (Pigment Mfg. 08-XIII), P438 (Pigment Mfg. 08-XIV), P439 (Pigment Mfg. 08-XV), P441 (Pigment Mfg. 12-III), P442 (Pigment Mfg. 12-IV), P443 (Pigment Mfg. 12-V), P444 (Pigment Mfg. 12-VI), P445 (Pigment Mfg. 12-VII), P446 (Pigment Mfg. 12-VIII), P447 (Pigment Mfg. 12-IX), P448 (Pigment Mfg. 12-X), P449 (Pigment Mfg. 12-XI), P450 (Pigment Mfg. 12-XII), P451 (Pigment Mfg. 12-XIII), P452 (Pigment Mixing 12-III), P453 (Pigment Mixing 12-1), P454 (Pigment Mixing 12-II), P455 (Pigment Dispersion 12-I), P456 (Pigment Dispersion 12- II), P457 (Liquid Color Solutions 02-II), P459 (Tank TF-XXV), P460 (Tank 14-VIII), P461 (Pigment Dispersion 12-IV), P462 (Milled Pigments), P466 (Grinding/ Blending 21-I), P467 (Pigment Mfg. 12-XV), P468 ((Pigment Mfg. 12-XVI), P469 ( Solvent Storage 12-I), P470 (FD&C Lakes Blending), P473 (Pigment Mfg. 12-XVII), P474 (Pigment Mfg. 12-XVIII),

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P475 (Pigment Mfg. 12-XIX), P476 ( Ball Mill A), P477 (Ball Mill B), P478 (Ball Mill C), P479 (Ball Mill D), P480 (Ball Mill E), P481 (Ball Mill F), P482 (Ball Mill G), P483 (Ball Mill L), P484 (High Speed Disperser 1), P485 (High Speed Disperser 2), P486 (High Speed Disperser 3), P487 (High Speed Disperser 4), P488 (High Speed Disperser 5), P489 (High Speed Disperser 6), P490 (High Speed Disperser 7), P491 (High Speed Disperser 8), P492 (High Speed Disperser 9), P493 (High Speed Disperser 10), P494 (High Speed Disperser 11), P495 (Drais Mill 1 DR), P496 (Drais Mill 2 DR), P497 (Drais Mill 3 DR), P498 (Drais Mill 4 DR), P499 (Pony Mixer 1), P500 (Double Post Mixer), P501 (Pony Mixer 3), P502 (Roll Mill 1), P503 (Roll Mill 2), P504 (Roll Mill 3), P505 (Roll Mill 4), P506 (Roll Mill 5), P507 (Roll Mill 6) T002 (Tank 14-III), T006 (Tank 54-I), T013 (Tank 12-IV), T014 (Tank 12-III), T015 (Tank 03-I), T020 (Tank 41-VI), T023 (Tank 13-I), T024 (Tank 13-II), T025 (Tank 13-III), T026 (Tank 13-IV), T027 (Tank 13-V), T028 (Tank 13-IX), T029 (Tank 13-VII), T030 (Tank 13-VIII), T035 (Tank 20-XIII), T037 (Tank 20-XV), T038 (Tank 20-X), T039 (Tank 20-XII), T042 (Tank 54-II), T047 (Tank 21-IV), T055 Tank TF-XX), T056 Tank TF-XXI), T061 Tank TF-VIII), T066 Tank TF-XIII), T067 (Tank 21-II), T069 (Tank 36-VII), T070 (Tank 36-V), T073 (Tank 36-VI), T077 (Tank 24-1), T078 (Tank 09-I), T079 (Tank TF-II), T080 (Tank TF-V), T081 (Tank TF-VI), T082 (Tank TF-VII), T085 (Tank 21-VI), T087 (Tank TF-I), T088 (Tank TF-IX), T089 (Tank TF-X), T090 (Tank TF-XII), T091 (Tank 21-III), T092 (Tank 14-V), T093 (Tank 21-I), T094 (Tank 14-I), T095 (Tank 54-III), T096 (Tank 14-IV), T097 (Tank 20-V), T098 (Tank 41-II), T099 (Tank 41-III), T100 (Tank 41-IV), T101 (Tank 41-V), T102 (Tank 41-VII), T103 (Tank 41-VIII), T104 (Tank 41-IX), T105 (Tank TF-XXIV), T106 (Tank TF-XXVI), T107 (Tank TF-XXVII), T108 (Tank 20-XVII), T109 (Tank 54-IV), T110 (Tank 14-VI), T111 (Tank 14-VII), T112 (Tank 20-I), T113 (Tank TF-XVIII), T114 (Tank 20-II), T115 (Tank TF-XXII), T116 (Tank 36-I), T117 (Tank 21-V), T118 (Tank 41-V), and T119 (Tank 36-IV), including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and permanent exemption air contaminant sources shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month emissions limitation upon issuance of the permit.

- 2.b** The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC), particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10) and particulate matter emissions 2.5 microns and less in

Emissions Unit ID: P510

diameter (PM<sub>2.5</sub>) from this air contaminant source since the potential to emit for VOC, PE, PM<sub>10</sub> and PM<sub>2.5</sub> is less than 10.0 TPY.

- 2.c** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.d** The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
- 2.e** The PE from the outlet of the fabric filter controlling this emissions unit shall not exceed 0.551 pound per hour based on Table I in OAC rule 3745-17-11(B).
- 2.f** The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.
- 2.g** The fugitive dust from this emissions unit shall be controlled by the use of reasonably available control measures adequate to minimize or eliminate visible particulate emissions.
- 2.h** The hourly PE limitation outlined in term A.2.e is based upon the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation.

## II. Operational Restrictions

None

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**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.a of this permit:
  - a. The name and identification number of each liquid material.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each liquid material.
  - c. The total combined HAP content of each liquid material [sum all the individual HAP contents from (b)].
  - d. The number of gallons transferred of each liquid material.
  - e. The total individual HAP emissions for each HAP from all liquid materials, in pounds or tons per month.
  - f. The total combined HAP emissions from all liquid materials, in pounds or tons per month [sum of all individual HAP emissions in (e)].
  - g. The updated rolling, 12-month summation of individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation of total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

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

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

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

**IV. Reporting Requirements**

1. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emissions limitation for the emission units identified in term and condition A.2.a. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate emissions and/or visible fugitive dust 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 periods.

**V. Testing Requirements**

Emissions Unit ID: P510

1. Compliance with the emission, hour and usage limitations in terms and conditions A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

The PE from the outlet of the fabric filter controlling emission unit P510 shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The hourly PE emission rate is based on Table 1 in OAC rule 3745-17-11. The actual emissions shall be calculated by: [(production rate in pounds per hour) x (% dry material)x (1.1 to account for PM content variability) x (1.0% AP-42 emission factor) / 24 hours per batch].
  - b. Emission Limitation:

The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

Applicable Compliance Method:

Compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas shall be calculated by:[(production rate in pounds per hour) x (% dry material) x (1.1 to account for PM content variability) x (1.0% AP-42 emission factor) / 24 hours per batch x {(95% capture efficiency) x (1-99% control efficiency)} x 7000 grain/ pound of PE / airflow in dry standard cubic feet per hour.]
  - c. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emission units listed in section A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.I.2.a shall be demonstrated by the record keeping requirements specified in section A.III.1.
  - d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

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Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

f. Emission Limitation:

The uncontrolled potential to emit for PE, PM10 and PM2.5 is less than ten tons per year.

Applicable Compliance Method:

The annual PE-PM10-PM2.5 emission rate is based on this emission unit's uncontrolled potential to emit. The annual PE-PM10-PM2.5 emission rate was calculated by:  $[(\text{production rate in pounds per hour}) \times (\% \text{ dry material}) \times (1.1 \text{ to account for PM content variability}) \times (1.0\% \text{ AP-42 emission factor}) / 24 \text{ hours per batch} \times 8760 \text{ hours per year} / 2000 \text{ pounds per ton}]$ .

g. Emission Limitation:

Volatile Organic Compound (VOC) emissions from this emissions unit is less than ten tons per year.

Applicable Compliance Method:

The hourly VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by:  $[(\text{production rate in pounds per hour}) \times (\text{VOC content}) \times (1.1 \text{ to account for OC content variability}) \times (1.5\% \text{ AP-42})]$ .

Emissions Unit ID: P510

emission factor) / 24 hours per batch x 8760 hours per year /2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment -(P510) - Foam Control Additive Manufacturing Train No. 3**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply

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for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment -(P511) - Foam Control Additive Manufacturing Train No. 4**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(C) Synthetic minor to avoid 40 CFR Part 63	See term and condition A.I.2.a.
ORC 3704.03(T)(4)	See term and condition A.I.2.b.
OAC rule 3745-17-07(A)(1)	See term and condition A.I.2.c.
OAC rule 3745-17-07(B)(1)	See term and condition A.I.2.d.
OAC rule 3745-17-11(B)	See term and condition A.I.2.e.
OAC rule 3745-17-08(B)(3)	See terms and conditions A.I.2.f and A.I.2.g.
OAC rule 3745-21-07(G)(2)	Exempt, due to Ohio Supreme Court decision of July 11, 2001 and the Ohio EPA permitting call held July 18, 2002.

**2. Additional Terms and Conditions**

- 2.a The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B001 (Dow Therm Heaters), F001 (Coal Handling 09-I), F002 (Fly Ash Handling 09-I), B007 (37.2 mmBtu/hr natural gas-fired boiler), B009 (90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone), B010 (90 mmBtu/hr traveling grate coal-fired boiler controlled with a multiclone), P154 (wastewater pretreatment (plantwide) controlled with Carbon adsorption system), P159 (Wastewater

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Pretreatment 52-II), P160 (Packout 41-I), P168 (Packout 41-II), P172 (Sizing, Packing Food Colors 01-I), P173 (Sizing, Packing Food Colors 02-II), P174 (Packout 10-I), P175 (Dye Reaction 06-I), P177 (Pigment Packout 08-I), P178 (Pigment Packout 08-II), P179 (Boiler 40-I), P180 (Food Color Packaging 40-I), P181 ((Dye Filtration 36-I), P184 (Granularizing Food Colors 01-I), P187 (Pigment Flushing 39-I), P188 (Dye Drying 21-II), P189 (Pigment Salt Milling 39-I), P190 (Dye Blending 10-I), P193 (Dye Material Handling and Packout 14-I), P194 (Pigment Flushing 10-V), P200 (Dye Drying 41-I), P207 (Dye Drying 41-II), P208 (Dye Drying 41-III), P209 (Seal Water Cooling 41-I), P215 (Dye Drying 21-I), P222 (Dye Grinding and Blending 41-I), P223 (Dye Reaction 36-I), P224 (Dye Reaction 36-II), P225 (Dye Reaction 36-III), P226 (Dye Reaction 36-IV), P227 (Condensate Recovery 36-I), P228 (Mother Liquor Handling 36-I), P229 (Wash Preparation 36-I), P230 (Dye Reaction 36-VI), P231 (Dye Reaction 36-VII), P232 (Dye Reaction 36-X), P233 (Dye Salting 36-I), P234 (Dye Slurry Holding 36-I), P237 (Dye Mixing and Milling 36-II), P238 (Dye Blending 36-I), P240 (Dye Reaction 36-IX), P241 (Dye Reaction 36-V), P242 (Condensate Recovery 36-II), P243 (Dye Reaction 36-VIII), P245 (Dye Reaction 20-I), P246 (Tray Drying 10-I), P249 (Tray Drying 10-II), P250 (Dye Reaction 10-I), P251 (Dye Clarification 20-I), P261 (Tray Drying 10-III), P263 (Tray Drying 10-IV), P266 (Tray Drying 10-V), P282 (Packout 21-I), P284 (Dye Drying 14-I), P295 (Dye Mfg. 12-I), P296 (Dye Reaction 12-I), P297 (Tray Drying 08-I), P313 (Dye Reaction 12-II), P314 (Dye Reaction 12-III), P315 (Separation/Filtration 12-I), P316 (Dry Reaction 12-IV), P317 (Dye Sulfonation 12-XIV), P318 (Dye Sulfonation 12-XV), P319 (Dye Sulfonation 12-I), P320 (Dye Sulfonation 12-II), P321 (Dye Sulfonation 12-III), P322 (Dye Sulfonation 12-IV), P323 (Dye Sulfonation 12-V), P324 (Dye Sulfonation 12-VI), P325 (Dye Sulfonation 12-VII), P326 (Dye Sulfonation 12-VIII), P327 (Dye Sulfonation 12-IX), P328 (Dye Sulfonation 12-X), P329 (Dye Sulfonation 12-XI), P330 (Dye Sulfonation 12-XII), P331 (Dye Sulfonation 12-XIII), P332 (Separation/Filtration 12-II), P333 (Separation/Filtration 12-IV), P334 (Separation/Filtration 12-V), P335 (Pigment Mfg. 12-II), P336 (Separation/Filtration 12-VII), P337 (Separation/Filtration 12-VIII), P338 (Pigment Mfg. 12-I), P339 (Dye Mfg. 12-II), P340 (Dye Mfg. 12-V), P341 (Dye Mfg. 12-VI), P342 (Dye Reaction 12-III), P343 (Dye Mfg. 12-III), P344 (Dye Mfg. 12-IV), P345 (Dye Mfg. 12-V), P346 (Dye Mfg. 12-VI), P347 (Dye Mfg. 12-VII), P348 (Dye Mfg. 12-VIII), P349 (Dye Mfg. 12-IX), P350 (Pigment Milling 12-I), P351 (Dye Reaction 12-VIII), P352 (Dye Mfg. XI), P353 (Separation/Filtration 12-X), P354 (Separation/Filtration 12-XI), P355 (Separation/Filtration 12 XII), P356 (Pigment Milling 12-II), P357 (Separation/Filtration 12-XIV), P358 (Dye Mfg. 12-XIII), P359 (Separation/Filtration 12-12-XV), P360 (Dye Mfg. 12-XIII), P361 (Dye Mfg. 12 XIV), P362 (Dye Mfg. 12-XV), P363 (Tray Drying 08-II), P364 (Tray Drying 08-

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III), P365 (Tray Drying 08-V), P366 (Vacuum Drying 08-I), P367 (Pigment Mfg. 08-I), P368 (Pigment Mfg. 08-II), P369 (Pigment Mfg. 08-III), P370 (Pigment Mfg. 08-IV), P371 (Diazo Pigment Reaction 08-II), P372 (Diazo Pigment Reaction 08-I), P373 (Grinding Blending), Packing Dyes 08-I), P374 (Grinding Blending), Packing Dyes 08-II), P379 (Varnish and Misc. Reaction 12-I), P380 (Varnish Mfg. 12-I), P381 (Varnish and Misc. Reaction 13-II), P382 (Varnish and Misc. Reaction 13-III), P383 (Packout 01-I), P384 (Packout 02-I), P385 (Tray Drying 02-I), P386 (Tray Drying 02-II), P387 (Food Color Mfg. 02-I), P388 (Tray Drying 01-I), P389 (Vacuum Drying 01-I), P390 (Spray Drying 02-I), P391 (Drum Drying Food Colors 020I), P392 (Liquid Color Solutions 02-I), P393 (Pilot Plant Reaction 35-I), P394 (Pilot Plant Reaction 35-II), P395 (Pilot Plant Vacuum Tray Drying 35-I), P396 (Pilot Plant Reaction 35-VI), P397 (Pilot Plant Vacuum Drying 35-I), P398 (Pilot Plant Tray Drying 35-I), P399 (Sizing, Packing Food Colors 02-III), P400 (Sizing, Packing Food Colors 02-II), P401 (Varnish and Misc. Reaction 13-IV), P402 (Pilot Plant Reaction 35-VIII), P403 (Pilot Plant Reaction 35-IX), P404 (Pilot Plant Reaction 35-X), P405 (Grinding, Blending, Packing Dyes 08-I), P406 (Grinding, Blending, Packing Dyes 08-II), P407 (Grinding, Packing Pigments 08-I), P408 (Pigment Filtration 08-I), P409 (Pigment Flushing 10-I), P410 (Pigment Flushing 10-II), P411 (Pigment Flushing 10-III), P412 (Pigment Flushing 10-IV), P413 (Pigment Flushing 10-VI), P414 (Pigment Flushing 10-VII), P415 (Pigment Flushing 10-VIII), P416 (Pigment Flushing 10-IX), P417 (Pigment Flushing 10-X), P418 (Pigment Flushing 10-XI), P419 (Pigment Flushing 10-XII), P420 (Pigment Flushing 10-XIII), P421 (Pigment Flushing 10-V), P422 (Spray Drying Food Colors), P423 (Pigment Dispersing 10-I), P424 (Pigment Milling 12-III), P425 (Separation/Filtration 12-XVII), P426 (Separation/Filtration 12-IX), P427 (Dye Mfg. 12-XVII), P428 (Dye Mfg. 12-XVIII), P429 (Dye Mfg. 12-XIX), P430 (Pigment Mfg. 08-VI), P431 (Pigment Mfg. 08-VII), P432 (Pigment Mfg. 08-VIII), P433 (Pigment Mfg. 08-IX), P434 (Pigment Mfg. 08-X), P435 (Pigment Mfg. 08-XI), P436 (Pigment Mfg. 08-XII), P437 (Pigment Mfg. 08-XIII), P438 (Pigment Mfg. 08-XIV), P439 (Pigment Mfg. 08-XV), P441 (Pigment Mfg. 12-III), P442 (Pigment Mfg. 12-IV), P443 (Pigment Mfg. 12-V), P444 (Pigment Mfg. 12-VI), P445 (Pigment Mfg. 12-VII), P446 (Pigment Mfg. 12-VIII), P447 (Pigment Mfg. 12-IX), P448 (Pigment Mfg. 12-X), P449 (Pigment Mfg. 12-XI), P450 (Pigment Mfg. 12-XII), P451 (Pigment Mfg. 12-XIII), P452 (Pigment Mixing 12-III), P453 (Pigment Mixing 12-1), P454 (Pigment Mixing 12-II), P455 (Pigment Dispersion 12-I), P456 (Pigment Dispersion 12- II), P457 (Liquid Color Solutions 02-II), P459 (Tank TF-XXV), P460 (Tank 14-VIII), P461 (Pigment Dispersion 12-IV), P462 (Milled Pigments), P466 (Grinding/ Blending 21-I), P467 (Pigment Mfg. 12-XV), P468 ((Pigment Mfg. 12-XVI), P469 ( Solvent Storage 12-I), P470 (FD&C Lakes Blending), P473 (Pigment Mfg. 12-XVII), P474 (Pigment Mfg. 12-XVIII),

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P475 (Pigment Mfg. 12-XIX), P476 (Ball Mill A), P477 (Ball Mill B), P478 (Ball Mill C), P479 (Ball Mill D), P480 (Ball Mill E), P481 (Ball Mill F), P482 (Ball Mill G), P483 (Ball Mill L), P484 (High Speed Dispenser 1), P485 (High Speed Dispenser 2), P486 (High Speed Dispenser 3), P487 (High Speed Dispenser 4), P488 (High Speed Dispenser 5), P489 (High Speed Dispenser 6), P490 (High Speed Dispenser 7), P491 (High Speed Dispenser 8), P492 (High Speed Dispenser 9), P493 (High Speed Dispenser 10), P494 (High Speed Dispenser 11), P495 (Drais Mill 1 DR), P496 (Drais Mill 2 DR), P497 (Drais Mill 3 DR), P498 (Drais Mill 4 DR), P499 (Pony Mixer 1), P500 (Double Post Mixer), P501 (Pony Mixer 3), P502 (Roll Mill 1), P503 (Roll Mill 2), P504 (Roll Mill 3), P505 (Roll Mill 4), P506 (Roll Mill 5), P507 (Roll Mill 6) T002 (Tank 14-III), T006 (Tank 54-I), T013 (Tank 12-IV), T014 (Tank 12-III), T015 (Tank 03-I), T020 (Tank 41-VI), T023 (Tank 13-I), T024 (Tank 13-II), T025 (Tank 13-III), T026 (Tank 13-IV), T027 (Tank 13-V), T028 (Tank 13-IX), T029 (Tank 13-VII), T030 (Tank 13-VIII), T035 (Tank 20-XIII), T037 (Tank 20-XV), T038 (Tank 20-X), T039 (Tank 20-XII), T042 (Tank 54-II), T047 (Tank 21-IV), T055 Tank TF-XX), T056 Tank TF-XXI), T061 Tank TF-VIII), T066 Tank TF-XIII), T067 (Tank 21-II), T069 (Tank 36-VII), T070 (Tank 36-V), T073 (Tank 36-VI), T077 (Tank 24-1), T078 (Tank 09-I), T079 (Tank TF-II), T080 (Tank TF-V), T081 (Tank TF-VI), T082 (Tank TF-VII), T085 (Tank 21-VI), T087 (Tank TF-I), T088 (Tank TF-IX), T089 (Tank TF-X), T090 (Tank TF-XII), T091 (Tank 21-III), T092 (Tank 14-V), T093 (Tank 21-I), T094 (Tank 14-I), T095 (Tank 54-III), T096 (Tank 14-IV), T097 (Tank 20-V), T098 (Tank 41-II), T099 (Tank 41-III), T100 (Tank 41-IV), T101 (Tank 41-V), T102 (Tank 41-VII), T103 (Tank 41-VIII), T104 (Tank 41-IX), T105 (Tank TF-XXIV), T106 (Tank TF-XXVI), T107 (Tank TF-XXVII), T108 (Tank 20-XVII), T109 (Tank 54-IV), T110 (Tank 14-VI), T111 (Tank 14-VII), T112 (Tank 20-I), T113 (Tank TF-XVIII), T114 (Tank 20-II), T115 (Tank TF-XXII), T116 (Tank 36-I), T117 (Tank 21-V), T118 (Tank 41-V), and T119 (Tank 36-IV), including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and permanent exemption air contaminant sources shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the rolling, 12-month emissions limitation upon issuance of the permit.

- 2.b** The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC), particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10) and particulate matter emissions 2.5 microns and less in

Emissions Unit ID: P511

diameter (PM<sub>2.5</sub>) from this air contaminant source since the potential to emit for VOC, PE, PM<sub>10</sub> and PM<sub>2.5</sub> is less than 10.0 TPY.

- 2.c** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.d** The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
- 2.e** The PE from the outlet of the fabric filter controlling this emissions unit shall not exceed 0.567 pound per hour based on Table I in OAC rule 3745-17-11(B).
- 2.f** The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.
- 2.g** The fugitive dust from this emissions unit shall be controlled by the use of reasonably available control measures adequate to minimize or eliminate visible particulate emissions.
- 2.h** The hourly PE limitation outlined in term A.2.e is based upon the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation.

## II. Operational Restrictions

None

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**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for each emissions unit or process identified in term A.2.a of this permit:
  - a. The name and identification number of each liquid material.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each liquid material.
  - c. The total combined HAP content of each liquid material [sum all the individual HAP contents from (b)].
  - d. The number of gallons transferred of each liquid material.
  - e. The total individual HAP emissions for each HAP from all liquid materials, in pounds or tons per month.
  - f. The total combined HAP emissions from all liquid materials, in pounds or tons per month [sum of all individual HAP emissions in (e)].
  - g. The updated rolling, 12-month summation of individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - h. The updated rolling, 12-month summation of total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

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

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

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

**IV. Reporting Requirements**

1. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emissions limitation for the emission units identified in term and condition A.2.a. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate emissions and/or visible fugitive dust 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 periods.

**V. Testing Requirements**

Emissions Unit ID: P511

1. Compliance with the emission, hour and usage limitations in terms and conditions A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

The PE from the outlet of the fabric filter controlling emission unit P511 shall not exceed 0.567 pound per hour.

Applicable Compliance Method:

The hourly PE emission rate is based on Table 1 in OAC rule 3745-17-11. The actual emissions shall be calculated by: [(production rate in pounds per hour) x (% dry material)x (1.1 to account for PM content variability) x (1.0% AP-42 emission factor) / 24 hours per batch]
  - b. Emission Limitation:

The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

Applicable Compliance Method:

Compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas shall be calculated by:[(production rate in pounds per hour) x (% dry material) x (1.1 to account for PM content variability) x (1.0% AP-42 emission factor) / 24 hours per batch x {(95% capture efficiency) x (1-99% control efficiency)} x 7000 grain/ pound of PE / airflow in dry standard cubic feet per hour.]
  - c. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emission units listed in section A.2.b.

Applicable Compliance Method:

Compliance with the HAP emission limitations in term A.I.2.a shall be demonstrated by the record keeping requirements specified in section A.III.1.
  - d. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

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Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

f. Emission Limitation:

The uncontrolled potential to emit for PE, PM10 and PM2.5 is less than ten tons per year.

Applicable Compliance Method:

The annual PE-PM10-PM2.5 emission rate is based on this emission unit's uncontrolled potential to emit. The annual PE-PM10-PM2.5 emission rate was calculated by:  $[(\text{production rate in pounds per hour}) \times (\% \text{ dry material}) \times (1.1 \text{ to account for PM content variability}) \times (1.0\% \text{ AP-42 emission factor}) / 24 \text{ hours per batch} \times 8760 \text{ hours per year} / 2000 \text{ pounds per ton}]$ .

g. Emission Limitation:

Volatile Organic Compound (VOC) emissions from this emissions unit is less than ten tons per year.

Applicable Compliance Method:

The hourly VOC emission rate is based on the emission unit's potential to emit. The potential to emit was calculated by:  $[(\text{production rate in pounds per hour}) \times (\text{VOC content}) \times (1.1 \text{ to account for OC content variability}) \times (1.5\% \text{ AP-42})]$ .

Emissions Unit ID: P511

emission factor) / 24 hours per batch x 8760 hours per year /2000 pounds per ton.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment -(P511) - Foam Control Additive Manufacturing Train No. 4**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply

Emissions Unit ID: P511

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for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.