



5/21/2015

Carl Danowski
 Emerald Performance Materials, LLC
 2235 Langdon Farm Rd.
 Cincinnati, OH 45237-4712

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 1431070039
 Permit Number: P0118779
 Permit Type: Initial Installation
 County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA
SWOAQA; Indiana; Kentucky



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Emerald Performance Materials, LLC**

Facility ID:	1431070039
Permit Number:	P0118779
Permit Type:	Initial Installation
Issued:	5/21/2015
Effective:	5/21/2015



Division of Air Pollution Control
Permit-to-Install
for
Emerald Performance Materials, LLC

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Final Permit-to-Install
Emerald Performance Materials, LLC
Permit Number: P0118779
Facility ID: 1431070039
Effective Date: 5/21/2015

Authorization

Facility ID: 1431070039
Facility Description: Manufacturer of Dyes and Pigments
Application Number(s): A0053133
Permit Number: P0118779
Permit Description: Initial installation of a water-based carbon dispersion process.
Permit Type: Initial Installation
Permit Fee: \$500.00
Issue Date: 5/21/2015
Effective Date: 5/21/2015

This document constitutes issuance to:

Emerald Performance Materials, LLC
2235 Langdon Farm Rd.
Cincinnati, OH 45237-4712

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

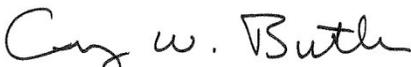
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install
Emerald Performance Materials, LLC
Permit Number: P0118779
Facility ID: 1431070039
Effective Date: 5/21/2015

Authorization (continued)

Permit Number: P0118779

Permit Description: Initial installation of a water-based carbon dispersion process.

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

Emissions Unit ID:	P521
Company Equipment ID:	21-14R&15R
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Emerald Performance Materials, LLC
Permit Number: P0118779
Facility ID: 1431070039
Effective Date: 5/21/2015

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



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

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.



- (2) 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 Southwest Ohio Air Quality Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Southwest Ohio Air Quality 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.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Southwest Ohio Air Quality 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).

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Southwest Ohio Air Quality 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 the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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



8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Southwest Ohio Air Quality 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 Southwest Ohio Air Quality 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 quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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



13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Final Permit-to-Install
Emerald Performance Materials, LLC
Permit Number: P0118779
Facility ID: 1431070039
Effective Date: 5/21/2015

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

2. 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-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, 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), P508 (Foam Control Additive Manufacturing Train No. 1), P509 (Foam Control Additive Manufacturing Train No. 2), P510 (Foam Control Additive Manufacturing Train No. 3), P511 (Foam Control Additive Manufacturing Train No. 4), P512 (Oil-based carbon dispersion process), P513 (Water-based carbon dispersion train), P514 (Mulch colorant dispersion media), P521 (Water-based carbon dispersion), 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), T055Tank TF-XX), T056Tank TF-XXI), T061Tank TF-VIII), T066Tank 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), 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.

3. The permittee shall collect and record the following information each month:
- a) The monthly single HAP emissions from all facility emissions units contained in 2. combined, in pounds, for each single HAP.
 - a) The rolling, 12-month summation of single HAP emissions, in tons, from all facility emission units contained in 2. combined calculated as below for each single HAP:

The rolling, 12-month summation of single HAP emissions = (monthly single HAP emissions from (a) + sum of monthly single HAP emissions from previous 11 calendar months) ÷ 2000.
 - b) The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units contained in 2. combined, in pounds.
 - c) The rolling, 12-month summation of total HAP (sum of all single HAP) emissions, in tons, from all facility emissions units contained in 2. combined calculated as below:

The rolling, 12-month summation of total HAP (sum of all single HAP emissions = (monthly total HAP emissions from (c) + sum of monthly total HAP emissions from previous 11 calendar months) ÷ 2000.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in 2. 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).

5. Emission Limitations:

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

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.

6. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart VVVVV, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing Area Sources. At this time the Ohio EPA is not accepting the delegating authority to



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enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



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C. Emissions Unit Terms and Conditions



1. P521, 21-14R&15R

Operations, Property and/or Equipment Description:

Water based carbon dispersion process

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

(1) b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) June 30, 2008	0.42 tons of VOC per month averaged over a rolling 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than 10 tons/yr.
c.	OAC rule 3745-31-05(D)	4.99 tons of VOC per rolling 12-month period. See b)(2)b.
d.	OAC rule 3745-17-07 (A)(1)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
e.	OAC rule 3745-17-07 (B)(1)	The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
f.	OAC rule 3745-17-08 (B)(3)	See b)(2)c. and b)(2)d.
g.	OAC rule 3745-17-11 (B)	Particulate emissions shall not exceed 4.03 lbs/hour.



(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 ton per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. The total process throughput for emissions unit P521 (Water-Based Carbon Dispersion Train) shall not exceed 216.5 tons per year based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production limits in the following table:

Month(s)	Maximum Allowable Tons of production
1	30
1-2	60
1-3	90
1-4	120
1-5	150
1-6	200
1-7	216.5
1-8	216.5
1-9	216.5
1-10	216.5
1-11	216.5
1-12	216.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emission limit shall be based upon a rolling, 12-month summation of product produced.

- c. 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.



- d. 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.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month:
 - a. The identification number of each batch made (product code).
 - b. The batch size in pounds.
 - c. The total monthly emissions as calculated below:

Monthly VOC emissions = Sum of [(b) x 0.023 lb of VOC emission/lb of product]
for all batches made per month.
 - d. The monthly rolling 12 month average in tons from this emissions unit as calculated below:

Rolling, monthly average of VOC emissions = (monthly VOC emissions from (c) + sum of monthly VOC emissions from previous 11 calendar months)/2000).
- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of both the rolling, 12 month VOC input and emission limitations and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
 - (2) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year
 - (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements

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



(1) Emission Limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 0.42 ton per month averaged over a rolling 12 month period

Applicable Compliance Method:

Compliance shall be determined based on recordkeeping in d)(1).

(2) Emission Limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 4.99 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on recordkeeping in d)(1).

(3) Emission Limitation:

Particulate emissions shall not exceed 4.03 pounds per hour.

Applicable Compliance Method:

Compliance with the particulate emissions limitation in b)(1) shall be determined by emission factors from AP-42 6.4-1 (5/83), Emission Factors for Printing Ink Manufacturing, and a dust collector capture efficiency of 90 percent and control efficiency of 99 percent.

(4) 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:

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(5) 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:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



(6) 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:

Compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.