Ohio Environmental Protection Agency

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

6/5/2015

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
Yes	SYNTHETIC MINOR TO AVOID MAJOR GHG

Steve Bonnell
Teva Women's Health
5040 Duramed Drive
Cincinnati, OH 45213

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431072038
Permit Number: P0116011
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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 PTIO 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)946-7777or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: SWOAQA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Teva Women's Health

Facility ID:	1431072038
Permit Number:	P0116011
Permit Type:	Renewal
Issued:	6/5/2015
Effective:	6/5/2015
Expiration:	6/4/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Teva Women's Health

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Authorization

Facility ID:	1431072038
Application Number(s):	A0048731
Permit Number:	P0116011
Permit Description:	PTIO Renewal permit for P006: Glatt fluidized bed dryer with packed-bed scrubber, carbon adsorption system, and HEPA filter.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	6/5/2015
Effective Date:	6/5/2015
Expiration Date:	6/4/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Teva Women's Health
5040 Duramed Drive
Cincinnati, OH 45213

of a Permit-to-Install and Operate 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 this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0116011
Permit Description: PTIO Renewal permit for P006: Glatt fluidized bed dryer with packed-bed scrubber, carbon adsorption system, and HEPA filter.

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

Emissions Unit ID:	**P006**
Company Equipment ID:	Glatt Fluid Bed Granulator
Superseded Permit Number:	P0104377
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) 3., 4., 5., and 6.

2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P006 (Glatt Fluid Bed Granulator), P007 (Niro Fluid Bed Granulator), P011 (Cleaning of Equipment - Production of Rings), and P012 (API Production), including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit 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.

3. The permittee shall collect and record the following information each month for the emissions units identified in section B.2:

   a) The name and identification number of each HAP containing material employed;

   b) The individual Hazardous Air Pollutant (HAP)* content for each HAP of each HAP containing material, in pounds of individual HAP per gallon of HAP containing material, as applied;

   c) The total combined HAP content of each HAP containing material in pounds of combined HAPs per gallon of HAP containing material, as applied [sum all the individual HAP contents from 3.b)];

   d) The number of gallons of each HAP containing material employed;

   e) The name and identification of each HAP containing cleanup material employed;

   f) The individual HAP content for each HAP of each HAP containing cleanup material, in pounds of individual HAP per gallon of HAP containing cleanup material, as applied;

   g) The total combined HAP content of each HAP containing cleanup material, in pounds of combined HAPs per gallon of HAP containing cleanup material, as applied [sum all the individual HAP contents from 3.f)];

   h) The number of gallons of each HAP containing cleanup material employed [the total number of gallons of each HAP containing cleanup material employed less the number of gallons of each HAP containing cleanup material collected for reuse and disposal];

i) The total individual HAP emissions for each HAP from all HAP containing material and HAP containing cleanup materials employed, in pounds or tons per month [for each HAP the sum of 3.b) times 3.d) times the emissions factor or overall control efficiency** (if applicable) for each HAP containing material plus the sum of 3.f) times 3.h) for each HAP containing cleanup material plus individual HAP emissions from any de minims emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources at the facility];

j) The total combined HAP emissions from all HAP containing materials and HAP containing cleanup materials employed, in pounds or tons per month [the sum of 3.c) times 3.d) times the emissions factor or overall control efficiency** (if applicable) for each coating plus the sum of 3.g) times 3.h) for each HAP containing cleanup material plus combined HAP emissions from any de minimis emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources at the facility];

k) The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

l) The updated rolling, 12-month summation of the 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 the Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.

**Overall control efficiency shall be from the most recent performance test that demonstrated that the emissions unit was in compliance.

4. The permittee shall notify the Southwest Ohio Air Quality Agency 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. Compliance with the HAP emission limitations cited in section B.2. shall be demonstrated by the recordkeeping in section B.3.

6. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart VVVVVV, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology (GACT) NESHAP applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. P006, Glatt Fluid Bed Granulator

Operations, Property and/or Equipment Description:

Fluidized Bed Granulator with packed-bed scrubber, carbon adsorption system, and HEPA filter

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(3), d)(3), e)(2), and f)(1)d.

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)	Volatile organic compound (VOC) emissions shall not exceed 39.7 lbs/hr. Particulate Emissions (PE) and Emissions of Particulate Matter 10 microns or less in diameter (PM10) shall not exceed 0.01 lb./hr and 0.01 TPY. See b)(2)b., b)(2)c., b)(2)d., c)(1) through c)(3). The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	VOC emissions shall not exceed 9.38 TPY based upon a rolling, 12-month summation. See section B.2. and c)(4)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05 (A)(3)
d.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05 (A)(3)
e.	OAC rule 3745-21-07(M)(3)(a)	Exempt per OAC rule 3745-21-17(M)(3)(c)(iii).
f.	OAC rule 3745-114	See d)(5) through d)(8) and e)(4).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of HEPA filter and packed-bed scrubber or carbon adsorption system, and compliance with the visible and mass emissions limitations and material usage limitations.

b. The permittee shall control the VOC emissions from this emissions unit by use of a packed-bed scrubber capable of maintaining a minimum overall VOC control efficiency of 90% by weight.

c. When manufacturing products utilizing chloroform, the exhaust gas from this emissions unit shall be controlled by a dual bed carbon adsorption unit prior to the packed-bed scrubber capable of maintaining a minimum overall VOC control efficiency of 99% by weight.

d. Visible particulate emissions from this emissions unit shall not exceed 10% opacity, as a six- minute average.

e. The hourly emission limitation for VOC outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.

c) Operational Restrictions

(1) The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

(2) The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

(3) The VOC concentration in the exhaust gases from the first bed of the dual bed carbon adsorption system shall not exceed a VOC concentration (ppm) of 50 ppm.

(4) The material usage for this emissions unit P006 shall be restricted such that the VOC emissions from this emissions unit P006 shall not exceed 85,273 kg (187,600 lbs)pounds per year, based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

The permittee shall collect and record the following information each day that the emissions unit is operating:

a. The scrubber water flow rate, in gallons per minute.

b. The scrubber water supply pressure, in psig.

c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

(2) The permittee shall collect and record the following information for each batch:

a. Date the batch was produced.

b. The company identification of the product manufactured in each batch.

c. The alcohol (lbs), chloroform (lbs), and other VOCs sprayed in each batch, by company product identification. This information may be kept in a separate, master record of batch formulation data.

(3) The permittee shall collect and record the following information each month:

a. The total VOC-containing material usage, in pounds.

b. The total number of batches per month.

c. The monthly VOC emissions.

The monthly VOC emissions shall be calculated as follows:

Monthly VOC emissions (lbs/month) = total alcohol sprayed during a month (pounds) * (1 - the scrubber control efficiency determined during the most recent performance test for alcohol usage) + the total chloroform sprayed during the same month (pounds) * (1 - the carbon absorption system control efficiency for chloroform usage [99%]).

d. The updated rolling, 12-month summation of total VOC-containing material usage, in pounds.

e. The updated rolling, 12-month summation of total VOC emissions, in tons.

These records shall be summarized at the end of each calendar year to determine the annual VOC emissions.

(4) The permittee shall operate and maintain an organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the first bed of the dual bed carbon adsorption system when the emissions unit is in operation, and using chloroform.

The permittee shall collect and record the following information each day:

a. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

b. The VOC concentration in ppm (parts per million) in the exhaust gases from the first bed of the dual bed carbon adsorption system (when the emissions unit was in operation, and using chloroform).

(5) The FEPTIO application for this emissions unit, P007, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological

Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/24 x 5/7 = 4 TLV/XY = MAGLC

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

Toxic Contaminant: Chloroform

TLV (mg/m3): 48.8

Maximum Hourly Emission Rate (lbs/hr): 3.97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 403.3

MAGLC (ug/m3): 1162

e. The permittee, has demonstrated that emissions of chloroform, from emissions unit P006, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTIOprior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) 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 District Office or 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 85,273 kg (187,600 lbs) of VOC input per year limitation, based upon a rolling, 12-month summation

ii. 9.38 tons per year VOC emissions limitation based upon a rolling, 12-month summation

iii. The HAPs limitation outlined in section B.2.

b. the probable cause of each deviation (excursion)

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submittedeach year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission limitation:

Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a 6-minute average.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

b. Emission limitation:

0.01 lb of PM/PM10/hr and 0.01 TPY.

Applicable Compliance Method:

Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the maximum loss factor (0.025 lbs of PE/PM10 per lb. of throughput) multiplied by the minimum HEPA control efficiency of 99.97%. The annual emission rate is obtained by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs/ton.

c. Emission limitation:

39.7 lbs of VOC/hr.

Applicable Compliance Method:

The weight rate of VOC sprayed in this emissions unit multiplied by 1 minus the overall control efficiency of the appropriate control technique as documented in Permit to Install application 14-05680 received on February 8, 2005.

d. Emission limitation:

9.38 TPY VOC based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the record keeping in d)(3).

(2) Compliance with the requirement to maintain a minimum overall VOC control efficiency of 90% by weight at the scrubber, per b)(2)b., shall be demonstrated by the latest scrubber OC control efficiency test and supported by mass transfer calculations from the scrubber manufacturer provided in the PTI application 14-05680 as received on February 8, 2005 and compliance with the scrubber operating requirements in c)(1).

(3) Compliance with the requirement to maintain a minimum overall VOC control efficiency of 99% by weight at the carbon adsorber, per b)(2)c., shall be demonstrated by the latest carbon adsorber OC control efficiency test and supported by data provided in the PTI application 14-05680 as received on February 8, 2005 and compliance with the carbon adsorber operating requirements in c)(2).

g) Miscellaneous Requirements

(1) None.