



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

10/6/2015

Nicole Hamilton
 Ashland Chemical Co.
 5200 Blazer Parkway
 Dublin, OH 43017

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0303010043
 Permit Number: P0118703
 Permit Type: Administrative Modification
 County: Ashland

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 Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Ashland Chemical Co.**

Facility ID:	0303010043
Permit Number:	P0118703
Permit Type:	Administrative Modification
Issued:	10/6/2015
Effective:	10/6/2015
Expiration:	9/20/2016



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Ashland Chemical Co.

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Final Permit-to-Install and Operate
Ashland Chemical Co.
Permit Number: P0118703
Facility ID: 0303010043
Effective Date: 10/6/2015

Authorization

Facility ID: 0303010043
Application Number(s): M0003316, M0003317
Permit Number: P0118703
Permit Description: Agency-initiated administrative modification to correct the permit renewal cycle and remove shutdown emissions units P015, P017 and P019.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 10/6/2015
Effective Date: 10/6/2015
Expiration Date: 9/20/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Ashland Chemical Co.
1745 Cottage Street
Ashland, OH 44805

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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: P0118703

Permit Description: Agency-initiated administrative modification to correct the permit renewal cycle and remove shutdown emissions units P015, P017 and P019.

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:	Mixer 10
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Mixer 1
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Mixer 19
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	Small Container Filling Line 1
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	Mixer 2
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	Mixer 6
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	Mixer 8 and Pre-mix Tank
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	Tote and Pail Filling
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Container Filling Line
Superseded Permit Number:	P0109646
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	Mixer 9
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable



Emissions Unit ID: P028
 Company Equipment ID: Mixer No. 20
 Superseded Permit Number: P0086764
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P029
 Company Equipment ID: Cleanup Ops
 Superseded Permit Number: P0086764
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T009
 Company Equipment ID: T-103
 Superseded Permit Number: P0086764
 General Permit Category and Type: Not Applicable

Group Name: Group 1

Emissions Unit ID:	P001
Company Equipment ID:	Mixer 4
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Mixer 18
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	mixer no. 5
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	Mixer No. 7
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable

Group Name: Group 2

Emissions Unit ID:	T004
Company Equipment ID:	T-105
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	T-102
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T006
Company Equipment ID:	T-109
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T007
Company Equipment ID:	T-101
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T008
Company Equipment ID:	T-104
Superseded Permit Number:	P0086764
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Ashland Chemical Co.
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Effective Date: 10/6/2015

Group Name: Group 3

Emissions Unit ID:	T010
Company Equipment ID:	T-110
Superseded Permit Number:	P0086764
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T012
Company Equipment ID:	T-106
Superseded Permit Number:	P0086764
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T013
Company Equipment ID:	T-107
Superseded Permit Number:	P0086764
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T014
Company Equipment ID:	T-108
Superseded Permit Number:	P0086764
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Ashland Chemical Co.
Permit Number: P0118703
Facility ID: 0303010043
Effective Date: 10/6/2015

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 being permanently shut down without first applying for and obtaining a permit pursuant to 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.



Final Permit-to-Install and Operate
Ashland Chemical Co.
Permit Number: P0118703
Facility ID: 0303010043
Effective Date: 10/6/2015

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) None.



Final Permit-to-Install and Operate
Ashland Chemical Co.
Permit Number: P0118703
Facility ID: 0303010043
Effective Date: 10/6/2015

C. Emissions Unit Terms and Conditions

1. P006, Mixer 10

Operations, Property and/or Equipment Description:

1,400 gallon mixer and container filling equipment (mixer no. 10)

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. None.

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

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)	18.64 lbs organic compounds (OC)/hr 8.25 lbs particulate emissions (PE)/hr Visible PE shall not exceed 20% opacity, as a six-minute average. See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		T007, T008, T009, T010, T012, T013 and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. 29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined. See b)(2)b., c)(1) and c)(2).
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, [See Term c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined [See Term c)(2)].



- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- e. The hourly emission limitations of 18.64 lbs OC/hr and 8.25 lbs PE/hr represent the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;
- U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum \sum [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;

- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.
- (3) The permittee shall collect and record the following information each month for materials processed in emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined:
- a. the company identification of each material processed [as defined in c)(2)];
 - b. the amount of each material processed, in pounds;
 - c. the PE emission factor for each material processed, in pounds of PE per pound of material processed);
 - d. the PE emission rate, in pounds, for each material processed [d)(3)b. x d)(3)c.];
 - e. the total PE emission rate from all materials processed [summation of d)(3)d.] for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month PE emission rate in tons
- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined;
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Term b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined; and
 - iii. the 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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 identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in Term d)(4) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (4) 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

(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:

18.64 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 5,500 pounds per hour and a maximum OC content of 3.389 lbs OC per 1,000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

8.25 lbs PE/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 5,500 lbs/hr, a 30% solids content, an assumption that 100% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.



d. Emission Limitation:

36.0 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

e. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

f. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(3).

g) Miscellaneous Requirements

(1) None.

2. P007, Mixer 1

Operations, Property and/or Equipment Description:

750 gallon mixer and container filling equipment (mixer no. 1)

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. None.

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

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)	2.03 lbs organic compounds (OC)/hr; 8.89 tons OC/yr 0.45 lb particulate emissions (PE)/hr Visible PE shall not exceed 20% opacity, as a six-minute average See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. 29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined. See b)(2)b., c)(1) and c)(2).
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, [See Term c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined [See Term c)(2)].

- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- e. The hourly emission limitations of 2.03 lbs OC/hr and 0.45 lb PE/hr represent the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;
- U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum \sum [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;

- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.
- (3) The permittee shall collect and record the following information each month for materials processed in emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined:
- a. the company identification of each material processed [as defined in c)(2)];
 - b. the amount of each material processed, in pounds;
 - c. the PE emission factor for each material processed, in pounds of PE per pound of material processed);
 - d. the PE emission rate, in pounds, for each material processed [d)(3)b. x d)(3)c.];
 - e. the total PE emission rate from all materials processed [summation of d)(3)d.] for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month PE emission rate in tons
- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined;
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined; and
 - iii. the 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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 identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in Term d)(4) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (4) 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

(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:

2.03 lbs OC/hr and 8.89 tons OC/yr.

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 600 pounds per hour and a maximum OC content of 3.389 lbs OC per 1,000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

0.45 lb PE/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 600 lbs/hr, a 30% solids content, an assumption that 100% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average



Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

36.0 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

e. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

f. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Term d)(3).

g) Miscellaneous Requirements

- (1) None.

3. P008, Mixer 19

Operations, Property and/or Equipment Description:

3,760 gallon mixer and container filling equipment (mixer no. 19)

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. d)(5).

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

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)	8.47 lbs organic compounds (OC)/hr; 0.38 lb particulate emissions (PE)/hr Visible PE shall not exceed 20% opacity, as a six-minute average See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>T007, T008, T009, T010, T012, T013 and T014, combined shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs.</p> <p>29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined.</p> <p>See b)(2)b., c)(1) and c)(2).</p>
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, [See Term c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined [See Term c)(2)].

- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- e. The hourly emission limitations of 8.47 lbs OC/hr and 0.38 lb PE/hr represent the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;
- U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;

- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.
- (3) The permittee shall collect and record the following information each month for materials processed in emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined:
- a. the company identification of each material processed [as defined in c)(2)];
 - b. the amount of each material processed, in pounds;
 - c. the PE emission factor for each material processed, in pounds of PE per pound of material processed);
 - d. the PE emission rate, in pounds, for each material processed [d)(3)b. x d)(3)c.];
 - e. the total PE emission rate from all materials processed [summation of d)(3)d.] for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month PE emission rate in tons
- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (5) 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 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.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined;
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined; and
 - iii. the 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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 identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in Term d)(4) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall

indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (4) 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
- (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:
- 8.47 lbs OC/hr.
- Applicable Compliance Method:
- The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.
- *The potential to emit is based on a maximum process weight rate of 2500 pounds per hour and a maximum OC content of 3.389 lbs OC per 1,000 pounds.
- If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.
- b. Emission Limitation:
- 0.38 lb PE/hr
- Applicable Compliance Method:
- The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.
- *The potential to emit is based on a maximum process weight rate of 600 lbs/hr, a 30% solids content, an assumption that 100% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.
- If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.
- c. Emission Limitation:
- Visible PE shall not exceed 20% opacity, as a 6-minute average



Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

36.0 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

e. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

f. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Term d)(3).

g) Miscellaneous Requirements

- (1) None.

4. P014, Small Container Filling Line 1

Operations, Property and/or Equipment Description:

Small container filling line

- 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. d)(3).
 - (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)(1), d)(1), d)(2), e)(2), f(1)b. and f)(1)c.
- 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)	4.42 lbs organic compounds (OC)/hr; 19.36 tons OC/yr See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		12-month period for any combination of HAPs. See b)(2)b. and c)(1).

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
- c. The hourly emission limitation of 4.42 lbs OC/hr represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;
- U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:
- a. the company identification of each material processed [as defined in c)(1)];
 - b. the amount of each material processed, in pounds;
 - c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
 - d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
 - e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month OC emission rates, in tons.
- (2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
- a. the company identification of each material processed;
 - b. identification of each individual HAP contained in each material processed;
 - c. the number of pounds of each material processed;
 - d. the calculated emission rate for each individual HAP from each material processed, in pounds;

- e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.
- (3) 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 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.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined; and
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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) 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

- (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:

4.42 lbs OC/hr; 19.36 tons/yr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 2,812.5 pounds per hour and a maximum OC content of 1.572 pounds per 1,000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation, the maximum operating schedule of 8760 hours/year, and a conversion factor of 0.0005 tons/lb. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

- b. Emission Limitation:

36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

- c. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004,



Final Permit-to-Install and Operate

Ashland Chemical Co.

Permit Number: P0118703

Facility ID: 0303010043

Effective Date: 10/6/2015

T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

g) Miscellaneous Requirements

(1) None.

5. P018, Mixer 2

Operations, Property and/or Equipment Description:

523 gallon mixer and container filling equipment (mixer no. 2)

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. None.

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

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)	8.30 lbs organic compounds (OC)/hr 3.68 lbs particulate emissions (PE)/hr Visible PE shall not exceed 20% opacity, as a 6-minute average See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D)	36.00 tons of per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. 29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined. See b)(2)b., c)(1) and c)(2).
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined [See c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined [See c)(2)].



- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- e. The hourly emission limitations of 8.30 lbs OC/hr and 3.68 lbs PE/hr represent the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;
- U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum \sum [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;

- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs combined from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (3) The permittee shall collect and record the following information each month for materials processed in emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined:
- a. the company identification of each material processed [as defined in c)(2)];
 - b. the amount of each material processed, in pounds;
 - c. the PE emission factor for each material processed, in pounds of PE per pound of material processed;
 - d. the PE emission rate, in pounds, for each material processed [d)(3)b. x d)(3)c.];
 - e. the total PE emission rate from all materials processed [summation of d)(3)d. for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month PE emission rate in tons.
- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined;
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined; and
 - iii. the 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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) 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.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in Term d)(4) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

8.30 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 2,450 pounds per hour and a maximum OC content of 3.389 lbs OC per 1,000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

3.68 lbs PE/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 2,450 lbs/hr, a 60% solids content, an assumption that 50% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.



d. Emission Limitation:

36.0 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

e. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

f. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined

g. Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(3).

g) Miscellaneous Requirements

(1) None.

6. P020, Mixer 6

Operations, Property and/or Equipment Description:

246 gallon mixer and container filling equipment (mixer no. 6)

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. None.

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

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)	4.97 lbs organic compounds (OC)/hr 1.69 lbs particulate emissions (PE)/hr Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average. See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D)	36.00 tons of per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. 29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined. See b)(2)b., c)(1) and c)(2).
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined [See c)(2)].

- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- e. The hourly emission limitations of 4.97 lbs OC/hr and 1.69 lbs PE/hr represent the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;
- U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum \sum [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;

- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.
- (3) The permittee shall collect and record the following information each month for materials processed in emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028 combined:
- a. the company identification of each material processed [as defined in b)(2)];
 - b. the amount of each material processed, in pounds;
 - c. the PE emission factor for each material processed, in pounds of PE per pound of material processed;
 - d. the PE emission rate, in pounds, for each material processed [d)(3)b. x d)(3)c.];
 - e. the total PE emission rate from all materials processed [summation of d)(3)d. for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month PE emission rate in tons.
- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined;
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined; and
 - iii. the 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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) 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.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in Term d)(4) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

4.97 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 1,467 pounds per hour and a maximum OC content of 3.389 lbs OC per 1,000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

1.69 lbs PE/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 1,467 lbs/hr, a 46% solids content, an assumption that 50% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.



d. Emission Limitation:

36.0 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

e. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

f. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(3).

g) Miscellaneous Requirements

(1) None.

7. P021, Mixer 8 and Pre-mix Tank

Operations, Property and/or Equipment Description:

1707 gallon mixer, 167 gallon pre-mix tank and container filling equipment (mixer no. 8 and pre-mix tank)

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

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

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)	25.42 lbs organic compounds (OC)/hr 9.00 lbs particulate emissions (PE)/hr Visible PE shall not exceed 20% opacity, as a 6-minute average See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D)	36.00 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. 29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined. See b)(2)b., c)(1) and c)(2).
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, [See c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined [See c)(2)].

- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- e. The hourly emission limitations of 25.42 lbs OC/hr and 9.00 lbs PE/hr represent the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;
- U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum \sum [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;

- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (3) The permittee shall collect and record the following information each month for materials processed in emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028 combined:
- a. the company identification of each material processed [as defined in c)(2)];
 - b. the amount of each material processed, in pounds;
 - c. the PE emission factor for each material processed, in pounds of PE per pound of material processed;
 - d. the PE emission rate, in pounds, for each material processed [d)(3)b. x d)(3)c.];
 - e. the total PE emission rate from all materials processed [summation of d)(3)d. for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month PE emission rate in tons.
- (4) The permit to install for this emissions unit P021 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene (F-2)

TLV (ug/m3): 191,610

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,827

MAGLC (ug/m3): 4,562

Pollutant: toluene (PV-8)

TLV (ug/m3): 191,610

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,768

MAGLC (ug/m3): 4,562

Pollutant: toluene (F-3)

TLV (ug/m3): 191,610

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,527

MAGLC (ug/m3): 4,562

Pollutant: methyl ethyl ketone (F-2)

TLV (ug/m3): 599,809

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,827

MAGLC (ug/m3): 14,281

Pollutant: methyl ethyl ketone (PV-8)

TLV (ug/m3): 599,809

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,768

MAGLC (ug/m3): 14,281

Pollutant: methyl ethyl ketone (F-3)

TLV (ug/m3): 599,809

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,527

MAGLC (ug/m3): 14,281

Pollutant: hexane (F-2)

TLV (ug/m3): 179,235

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,827

MAGLC (ug/m3): 4,268

Pollutant: hexane (PV-8)

TLV (ug/m3): 179,235

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,768

MAGLC (ug/m3): 4,268

Pollutant: hexane (F-3)

TLV (ug/m3): 179,235

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,527

MAGLC (ug/m3): 4,268

- (5) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack

diameter, etc.). If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (6) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy."
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
 - (7) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
 - (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined;
- ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined; and
- iii. the 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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) 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.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in Term d)(7) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

25.42 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 7,500 pounds per hour and a maximum OC content of 3.389 lbs OC per 1,000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

9.00 lbs PE/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 7500 lbs/hr, a 60% solids content, an assumption that 40% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029 combined



Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

e. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Term d)(2).

f. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(3).

g) Miscellaneous Requirements

(1) None.

8. P022, Tote and Pail Filling

Operations, Property and/or Equipment Description:

Tote and pail filling (container filling associated with mixers no. 7 and 8)

- 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. d)(3), d)(5) and d)(5).
 - (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)(1), d)(1), d)(2), e)(2), f)(1)b., and f)(1)c.
- 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)	12.0 lbs organic compounds (OC)/hr See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		any combination of HAPs. See b)(2)b. and c)(1).

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined [See c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
- c. The hourly emission limitation of 12.00 lbs OC/hr represents the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;
- U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:
- a. the company identification of each material processed [as defined in c)(1)];
 - b. the amount of each material processed, in pounds;
 - c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
 - d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
 - e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month OC emission rates, in tons.
- (2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined:
- a. the company identification of each material processed;
 - b. identification of each individual HAP contained in each material processed;
 - c. the number of pounds of each material processed;
 - d. the calculated emission rate for each individual HAP from each material processed, in pounds;

- e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs combined from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (3) The permit to install for this emissions unit P022 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene (F-12)

TLV (ug/m3): 191,610

Maximum Hourly Emission Rate (lbs/hr): 12 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 664.6

MAGLC (ug/m3): 4,562

Pollutant: toluene (P-22)

TLV (ug/m3): 191,610

Maximum Hourly Emission Rate (lbs/hr): 3.52 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1814

MAGLC (ug/m3): 4,562

Pollutant: methyl ethyl ketone (F-12)

TLV (ug/m3): 599,809

Maximum Hourly Emission Rate (lbs/hr): 12 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 664.6

MAGLC (ug/m3): 14,281

Pollutant: methyl ethyl ketone (P-22)

TLV (ug/m3): 599,809

Maximum Hourly Emission Rate (lbs/hr): 3.52 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1814

MAGLC (ug/m3): 14,281

Pollutant: hexane (F-12)

TLV (ug/m3): 179,235

Maximum Hourly Emission Rate (lbs/hr): 12 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 664.6

MAGLC (ug/m3): 4,268

Pollutant: hexane (P-22)

TLV (ug/m3): 179,235

Maximum Hourly Emission Rate (lbs/hr): 3.52 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,814

MAGLC (ug/m3): 4,268

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters; the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and



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 submitted, electronically through Ohio EPA Air Services, each 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) 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

- (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:

12.0 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 5,000 pounds per hour and a maximum OC content of 2.4 pounds per 1,000 pounds.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation:

36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029 combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).



c. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

g) Miscellaneous Requirements

(1) None.



9. P023, Container Filling Line

Operations, Property and/or Equipment Description:

Container filling line (drums and 5 gallon buckets) with two 863 gallon carbon steel holding tanks (TK-601D and TK-601E)

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

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

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)	14.0 lbs organic compounds (OC)/hr See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. See b)(2)b. and c)(1).

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined [See c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
- c. The hourly emission limitation of 14.00 lbs OC/hr represents the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
- N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
- C_i = OC emission factor, in lbs OC per lb of material i processed;

U_i = pounds of material i processed;

Material i , is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i , while bag loaded solids material would be defined as another material i , etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028 combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;
- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
- f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and

- g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (3) The permit to install for this emissions unit P023 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: toluene (F-3)
- TLV (ug/m3): 191,610
- Maximum Hourly Emission Rate (lbs/hr): 14 lbs/hr
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1527
- MAGLC (ug/m3): 4,562
- Pollutant: methyl ethyl ketone (F-3)
- TLV (ug/m3): 599,809
- Maximum Hourly Emission Rate (lbs/hr): 14 lbs/hr
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,527
- MAGLC (ug/m3): 14,281
- Pollutant: hexane (F-12)
- TLV (ug/m3): 179,235
- Maximum Hourly Emission Rate (lbs/hr): 14 lbs/hr
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,527
- MAGLC (ug/m3): 4,268
- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.

Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined; and
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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) 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

- (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:

14.0 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 7,500 pounds per hour and a maximum OC content of 1.867 pounds per 1,000 pounds.



Final Permit-to-Install and Operate

Ashland Chemical Co.

Permit Number: P0118703

Facility ID: 0303010043

Effective Date: 10/6/2015

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027 and P028 combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

c. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

g) Miscellaneous Requirements

(1) None.



10. P024, Mixer 9

Operations, Property and/or Equipment Description:

2,426 gallon mixer and container filling equipment (mixer no. 9)

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. d)(5).

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

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)	12.71 lbs organic compounds (OC)/hr 5.63 lbs particulate emissions (PE)/hr See b)(2)a. and b)(2)d.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs.</p> <p>29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined.</p> <p>See b)(2)b., c)(1) and c)(2).</p>
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029 combined [See c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028 combined [See c)(2)].
- c. The requirements established pursuant to this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).

- d. The hourly emission limitations of 12.71 lbs OC/hr and 28.13 lbs PE/hr represent the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

- M = the increment of the rolling 12-month period;
 N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029
 C_i = OC emission factor, in lbs OC per lb of material i processed;
 U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

where,

- M = the increment of the rolling 12-month period;
 N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, and P029 combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;
- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;

- f. the total HAP emission rate for all HAPs combined from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (3) The permittee shall collect and record the following information each month for materials processed in emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028 combined:
- a. the company identification of each material processed [as defined in c)(2)];
 - b. the amount of each material processed, in pounds;
 - c. the PE emission factor for each material processed, in pounds of PE per pound of material processed;
 - d. the PE emission rate, in pounds, for each material processed [d)(3)b. x d)(3)c.];
 - e. the total PE emission rate from all materials processed [summation of d)(3)d. for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month PE emission rate in tons.
- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (5) 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 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.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined;
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined; and
 - iii. the 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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) 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.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in Term d)(4) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall

indicate within the “Additional Information and Corrections” section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

12.71 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 3,750 pounds per hour and a maximum OC content of 3.389 lbs OC per 1,000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

5.63 lbs PE/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 11,250 3,750 lbs/hr, a 30% solids content, an assumption that 100% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029 combined



Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

d. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

e. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028 combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(3).

f. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

11. P028, Mixer No. 20

Operations, Property and/or Equipment Description:

650 gallon mixer and container filling equipment (mixer no. 20 - change can mixer)

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. d)(5).

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

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)	10.51 lbs organic compounds. (OC)/hr 7.75 lbs particulate emissions (PE)/hr Visible PE shall not exceed 20% opacity, as a 6-minute average. See b)(2)a. and b)(2)e.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, and P029 combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028 combined. See b)(2)b., c)(1) and c)(2).
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, and P029 combined, [See b)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined [See c)(2)].

- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- e. The hourly emission limitations of 10.51 lbs OC/hr and 7.75 lbs PE/hr represent the potential to emit for this emission unit. Therefore, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029

C_i = OC emission factor, in lbs OC per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum \sum [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, and P029 combined:

- a. the company identification of each material processed [as defined in c)(1)];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
- e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
- f. the rolling, 12-month OC emission rates, in tons.

(2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined:

- a. the company identification of each material processed;
- b. identification of each individual HAP contained in each material processed;
- c. the number of pounds of each material processed;

- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs combined from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (3) The permittee shall collect and record the following information each month for materials processed in emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028 combined:
- a. the company identification of each material processed [as defined in c)(2)];
 - b. the amount of each material processed, in pounds;
 - c. the PE emission factor for each material processed, in pounds of PE per pound of material processed;
 - d. the PE emission rate, in pounds, for each material processed [d)(3)b. x d)(3)c.];
 - e. the total PE emission rate from all materials processed [summation of d)(3)d. for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month PE emission rate in tons.
- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (5) 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 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.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined;
 - ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined; and
 - iii. the 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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) 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.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in Term d)(4) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

- b. any corrective actions taken to eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

10.51 lbs OC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 3,100 pounds per hour and a maximum OC content of 3.389 lbs OC per 1,000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation:

7.75 lbs PE/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum process weight rate of 3,100 lbs/hr, a 50% solids content, an assumption that 100% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.



c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, and P029 combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

e. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

f. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028 combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(3).

g) Miscellaneous Requirements

(1) None.

12. P029, Cleanup Ops

Operations, Property and/or Equipment Description:

Facility wide cleanup operations

- 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. d)(4).
 - (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)(1), d)(2), d)(3), e)(2), f)(1)b., and f)(1)c.
- 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(F)	511.67 lbs organic compounds (OC)/month, 3.07 tons OC/yr See b)(2)a.
b.	OAC rule 3745-31-05(D)	36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028 combined. Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rolling 12-month period for any combination of HAPs. See b)(2)b. and c)(1).

(2) Additional Terms and Conditions

- a. The permittee has requested voluntary allowable emission limitations of 511.67 lbs OC/month and 3.07 tons OC/yr. The short-term (lbs/month) and long-term (tons/yr) emission limitations for OC are being established as practically and legally enforceable requirements representing the potential to emit.
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, [See c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029

C_i = OC emission factor, in lbs OC per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following each month for cleanup operations at the facility:

- a. the name and identification of each cleanup material employed;
- b. the OC content of each cleanup material employed, in pounds per gallon;
- c. the number of gallons of each cleanup material employed;
- d. the OC emissions from each cleanup material employed $[d)(1)b. \times d)(1)c.]$;
- e. the total OC emissions from all the cleanup materials employed [summation of $d)(1)d.$ for all cleanup materials] in pounds or tons; and
- f. the annual year to date OC emissions from the cleanup operations, in tons per year [summation of $d)(1)e.$ for each calendar month to date from January to December].

(2) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, and P029 combined:

- a. the company identification of each material processed [as defined in $c)(1)$];
- b. the amount of each material processed, in pounds;
- c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed $[d)(2)b. \times d)(2)c.]$;
- e. the total OC emission rate from all materials processed [summation of $d)(2)d.$ for all materials processed], in pounds or tons; and

- f. the rolling, 12-month OC emission rates, in tons.
- (3) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined:
- a. the company identification of each material processed;
 - b. identification of each individual HAP contained in each material processed;
 - c. the number of pounds of each material processed;
 - d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(3)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(3)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (4) 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 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.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
 - (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. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined; and
- ii. the rolling individual HAP and combined HAPs emission limitations specified in Ter b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.-

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 submitted, electronically through Ohio EPA Air Services, each 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) 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

- (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:

511.67 lbs OC/month and 3.07 tons OC/yr

Applicable Compliance Method:

Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the recordkeeping requirements specified in section d)(1) of this permit.

- b. Emission Limitation:

36.00 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, and P029 combined



Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

c. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(3).

g) Miscellaneous Requirements

(1) None.

13. T009, T-103

Operations, Property and/or Equipment Description:

20,000 gallon vertical fixed roof storage tank (tank 103)

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. d)(3).

(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., d)(2), e)(2) and f)(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)	1.85 tons of organic compounds (OC)/yr See b)(2)a.
b.	OAC rule 3745-31-05(D)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. See b)(2)b.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of submerged fill and includes compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit shall not exceed 960,000 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the amount of material throughput, in gallons; and
 - b. the OC emissions, in pounds, calculated with a factor developed from the Tanks 4.0 program and the actual amount of material throughput, from Term d)(1)a. above.
- (2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined:
 - a. the company identification of each material processed;
 - b. identification of each individual HAP contained in each material processed;
 - c. the number of pounds of each material processed;
 - d. the calculated emission rate for each individual HAP from each material processed, in pounds;

- e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs combined from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (3) 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 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.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
 - (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. the rolling individual HAP and combined HAPs emission limitations specified in Term b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- 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 submitted, electronically through Ohio EPA Air Services, each 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) 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

- (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: 1.85 tons OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in Term d)(1) of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

g) Miscellaneous Requirements

- (1) None.



14. Emissions Unit Group -Group 1: P001, P005, P026, P027,

EU ID	Operations, Property and/or Equipment Description
P001	3200 gallon mixer and container filling equipment (mixer no. 4)
P005	1200 gallon mixer (mixer no. 18)
P026	523 gallon mixer and container filling euqipment (mixer no. 5)
P027	1210 gallon mixer, 318 gallon pre-mix tank and container filling equipment (mixer no. 7 and pre-mix tank)

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. None.

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

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(D)	<p>36.00 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined.</p> <p>Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. 29.90 tons of particulate emissions (PE) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined. See b)(2)a., c)(1) and c)(2).
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. 36.00 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, [See Term c)(1)]. For purposes of federal enforceability, a limitation on OC effectively limits VOC.
 - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

 These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
 - iii. 29.90 tons of PE per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027, and P028, combined [See Term c)(2)].
- b. These emissions units are exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- c. The uncontrolled mass rate of particulate emissions from these emissions units is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure

II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 36.00$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029

C_i = OC emission factor, in lbs OC per lb of material i processed;

U_i = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i, while bag loaded solids material would be defined as another material i, etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

- (2) The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(C_i)(U_i)] \div 2,000 \text{ lbs/ton} \leq 29.90$$

where,

M = the increment of the rolling 12-month period;

N = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028

C_i = PE emission factor, in lbs PE per lb of material i processed;

U_i = pounds of material i processed;

Material i , is defined as a unique material that is processed by a given operation (i.e. vacuum loaded pulverized rubber material would be defined as a single material i , while bag loaded solids material would be defined as another material i , etc.)

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material processed, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined:
 - a. the company identification of each material processed [as defined in c)(1)];
 - b. the amount of each material processed, in pounds;
 - c. the OC emission factor for each material processed, in pounds of OC per pound of material processed;
 - d. the OC emission rate, in pounds, for each material processed [d)(1)b. x d)(1)c.];
 - e. the total OC emission rate from all materials processed [summation of d)(1)d. for all materials processed], in pounds or tons; and
 - f. the rolling, 12-month OC emission rates, in tons.
- (2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
 - a. the company identification of each material processed;
 - b. identification of each individual HAP contained in each material processed;
 - c. the number of pounds of each material processed;
 - d. the calculated emission rate for each individual HAP from each material processed, in pounds;
 - e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs, combined, from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and

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 submitted, electronically through Ohio EPA Air Services, each 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) 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

- (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:

36.0 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028 and P029, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(1).

b. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

c. Emission Limitation:

29.90 tons of PE per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P018, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(3).



Final Permit-to-Install and Operate
Ashland Chemical Co.
Permit Number: P0118703
Facility ID: 0303010043
Effective Date: 10/6/2015

- g) Miscellaneous Requirements
 - (1) None.

15. Emissions Unit Group -Group 2: T004,T005,T006,T007,T008

EU ID	Operations, Property and/or Equipment Description
T004	11,000 gallon vertical fixed roof storage tank (tank 105)
T005	11,000 gallon vertical fixed roof storage tank (tank 102)
T006	11,000 gallon vertical fixed roof storage tank (tank 109)
T007	11,000 gallon vertical fixed roof storage tank (tank 101)
T008	11,000 gallon vertical fixed roof storage tank (tank 104)

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. None.

(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., d)(2), e)(2), and f(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(F)	1.00 tons of organic compounds (OC)/yr See b)(2)a.
b.	OAC rule 3745-31-05(D)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. See b)(2)b.

(2) Additional Terms and Conditions

- a. The permittee has voluntarily requested an allowable emission limitation for OC of 1.00 tons/yr. The long-term emission limitation for OC is being established as a practically and legally enforceable requirement representing the potential to emit based on the maximum annual throughput for these emission units [see c)(1)].
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

c) Operational Restrictions

- (1) The maximum annual throughput for these emissions units shall not exceed 528,000 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for these emissions units:
 - a. the amount of material throughput, in gallons; and
 - b. the OC emissions, in pounds, calculated with a factor developed from the Tanks 4.0 program and the actual amount of material throughput, from Term d)(1)a.
- (2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined:
 - a. the company identification of each material processed;
 - b. identification of each individual HAP contained in each material processed;
 - c. the number of pounds of each material processed;

- d. the calculated emission rate for each individual HAP from each material processed, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
- f. the total HAP emission rate for all HAPs combined from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
- g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (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. the rolling individual HAP and combined HAPs emission limitations specified in Term b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

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 submitted, electronically through Ohio EPA Air Services, each 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) 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

(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:

1.0 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in Term d)(1) of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

b. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

g) Miscellaneous Requirements

(1) None.

16. Emissions Unit Group -Group 3: T010,T012,T013,T014,

EU ID	Operations, Property and/or Equipment Description
T010	20,000 gallon vertical fixed roof storage tank (tank 110)
T012	11,300 gallon vertical fixed roof storage tank (tank 106)
T013	11,300 gallon vertical fixed roof storage tank (tank 107)
T014	11,300 gallon vertical fixed roof storage tank (tank 108)

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. d)(3).

(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., d)(2), e)(2), and f)(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)	0.25 ton of organic compounds (OC)/yr See b)(2)a.
b.	OAC rule 3745-31-05(D)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs [See b)(2)b.i.]

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for these emissions units have been determined to be the use of submerged fill and includes compliance with the requirements of OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
 - i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

c) Operational Restrictions

- (1) The maximum annual throughput for these emissions units shall not exceed 528,000 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for these emissions units:
 - a. the amount of material throughput, in gallons; and
 - b. the OC emissions, in pounds, calculated with a factor developed from the Tanks 4.0 program and the actual amount of material throughput, from section d)(1)a. above.
- (2) The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014 combined:
 - a. the company identification of each material processed;
 - b. identification of each individual HAP contained in each material processed;
 - c. the number of pounds of each material processed;
 - d. the calculated emission rate for each individual HAP from each material processed, in pounds;

- e. the total emission rate for each individual HAP from all the materials processed [for each individual HAP, the summation of d)(2)d. for all materials processed], in pounds;
 - f. the total HAP emission rate for all HAPs combined from all materials processed [summation of d)(2)e. for all HAPs for all materials processed], in pounds; and
 - g. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
- (3) 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 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.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
 - (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. the rolling individual HAP and combined HAPs emission limitations specified in Term b)(2)b. from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- 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 submitted, electronically through Ohio EPA Air Services, each 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) 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

- (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:

0.25 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in Term d)(1) of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

b. Emission Limitation:

Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P018, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in Term d)(2).

g) Miscellaneous Requirements

- (1) None.