Ohio Environmental Protection Agency

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

10/14/2015

Certified Mail

Yes	TOXIC REVIEW
No	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

Teresa Turnbow
Patheon Pharmaceuticals Inc.
2110 EAST GALBRAITH RD
Cincinnati, OH 45237

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431380503
Permit Number: P0119347
Permit Type: Initial Installation
County: Hamilton

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Patheon Pharmaceuticals Inc. is a CDMO (contract development and manufacturing organization) and manufacturer of pharmaceuticals. Through this PTIO, Patheon Pharmaceuticals Inc. proposes to increase production of an existing de minimus status fluid bed dryer P052 (not previously permitted) that will produce sustained released aspirin tablets used in preventing strokes and acute cardiovascular events. Previously the emissions unit was a source of only particulate emissions. With this PTIO the emissions unit will emit organic compound (OC) emissions as well. The particulate emissions will be controlled by a cartridge filter and the OC emissions will be controlled by a thermal oxidizer. Patheon Pharmaceuticals Inc. is currently a synthetic minor facility for hazardous air pollutants (HAPs) and OC. The synthetic minor status will not change as a result of this permit.

3. Facility Emissions and Attainment Status:

   Patheon Pharmaceuticals Inc. is located in Hamilton County, Ohio which is currently non-attainment for ozone and $PM_{2.5}$ and attainment for all other criteria pollutants. Patheon Pharmaceuticals Inc. is a synthetic minor facility for organic compound (OC) and hazardous air pollutant (HAP) emissions based on its unrestricted potential to emit OC being greater than 100 TPY and HAPs being greater than 25 TPY. The current requirements to employ control equipment (thermal oxidizer) and a throughput limitation of 710,000 pounds per year keep the controlled potential to emit to less than 100 TPY OC facility-wide. The facility has accepted emission unit specific emissions restrictions for OC and HAP emissions in order to avoid Title V applicability.

4. Source Emissions:

   The total allowable OC emission rate from P052 is 7.1 tons per year (TPY) and controlled by a thermal oxidizer with a design efficiency of 98% control. The total allowable $PE/PM_{10}/PM_{2.5}$ emission rate from P052 is 1.02 pounds per hour and controlled by a cartridge filter with a design efficiency of 99.97% control.

5. Conclusion:

   The facility will retain synthetic minor designation. This permit should be considered for issuance in draft.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
OC	7.1
Single HAP	9.9
Combined HAPs	24.9
Pollutant	**Pounds Per Hour**
PE/PM10/PM2.5	1.02

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Initial Installation
Patheon Pharmaceuticals Inc.
2110 East Galbraith Rd,, Cincinnati, OH 45237
ID#:P0119347
Date of Action: 10/14/2015
Permit Desc:Initial PTIO for a previous de minimus fluid bed dryer (P052) controlled by a thermal oxidizer..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Patheon Pharmaceuticals Inc.

Facility ID:	1431380503
Permit Number:	P0119347
Permit Type:	Initial Installation
Issued:	10/14/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Patheon Pharmaceuticals Inc.

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 12

1. P052, TG161 Fluid Bed Dryer controlled by a cartridge filter and thermal oxidizer 13

Authorization

Facility ID:	1431380503
Application Number(s):	A0054004
Permit Number:	P0119347
Permit Description:	Initial PTIO for a previous de minimus fluid bed dryer (P052) controlled by a thermal oxidizer.
Permit Type:	Initial Installation
Permit Fee:	$200.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/14/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Patheon Pharmaceuticals Inc.
2110 East Galbraith Rd
Cincinnati, OH 45237

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119347
Permit Description: Initial PTIO for a previous de minimus fluid bed dryer (P052) controlled by a thermal oxidizer.

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

Emissions Unit ID:	**P052**
Company Equipment ID:	TG161
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B003 (72.6 MMBtu/hr Natural Gas / No. 2 Fuel Oil Fired Boiler), P002 (capsule production line), P003 (Tablet coating line), P004 (Tablet coating line), P005 (Tablet coating line), P006 (Tablet coating line) P007 (fluid bed dryer), P008 (dry products line), P010 (dry packaging), P014 (granulation processing), P044-P047 (drying ovens), P048 (Tablet coating line), P051 (Intermediate Scale Processing Suite for pharmaceutical products), P052 (TG161fluid bed dryer), any de minimis emissions units as defined in OAC rule 3745-15-05, and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

      The permittee has existing records to demonstrate compliance with the limitations in B.1.b)(1) upon permit issuance.

      (2) The permittee shall collect and record the following information each month for emissions units B003 (72.6 MMBtu/hr Natural Gas / No. 2 Fuel Oil Fired Boiler), P002 (capsule production line), P003 (Tablet coating line), P004 (Tablet coating line), P005 (Tablet coating line), P006 (Tablet coating line) P007 (fluid bed dryer), P008 (dry products line), P010 (dry packaging), P014 (granulation processing), P044-P047 (drying ovens), P048 (Tablet coating line), P051 (Intermediate Scale Processing Suite for pharmaceutical products), P052 (TG161fluid bed dryer) and any de minimis defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units:

         a. The name and identification number of each coating or solvent employed;

         b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating or solvent in pounds of individual HAP per pound of coating or solvent, as applied;

         c. The total combined HAP content of each coating or solvent in pounds of combined HAPs per pound of coating or solvent, as applied [sum all the individual HAP contents from (b)];

         d. The number of pounds of each coating or solvent employed;

         e. The name and identification of each cleanup material employed;

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

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

h. The number of gallons of each cleanup material employed;

i. The total individual HAP emissions for each HAP from all coatings (or solvents) and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the emissions factor (if applicable) for each coating or solvent plus the sum of (f) times (h) for each cleanup material plus individual HAP emissions from any de minimis, registration status and/or permit exempt emissions unit at the facility];

j. The total combined HAP emissions from all coatings (or solvents) and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emissions factor (if applicable) for each coating or solvent plus the sum of (g) times (h) for each cleanup material plus combined HAP emissions from any de minimis, registration status and/or permit exempt emissions unit at the facility];

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

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

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

(3) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any exceedance of the HAP emissions limitations outlined in B.1.b)(1). If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

(4) Emission limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in term and condition B.1.b)(1) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the record keeping requirements established in B.1.b)(2).

C. Emissions Unit Terms and Conditions

1. P052, TG161 Fluid Bed Dryer controlled by a cartridge filter and thermal oxidizer

Operations, Property and/or Equipment Description:

Initial PTIO application for a previous de minimus fluid bed dryer (P052) controlled by a cartridge filter and a thermal oxidizer.

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)(6), d)(7), d)(8), d)(9) and e)(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)c., b)(2)c., c)(1), d)(1), and e)(2)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Organic compound (OC) emissions from this emissions unit shall not exceed 7.1 tons per year (TPY) averaged over a 12-month rolling period. The permittee shall control particulate emissions (PE), emissions of particulate matter 10 microns and less (PM_{10}), and emissions of particulate matter 2.5 microns and less ($PM_{2.5}$) from this emissions unit by use of a cartridge filter with a minimum overall PM design efficiency of 99.97% control by weight. This requirement shall apply whenever the permittee is using particulate matter materials in the emissions unit. See b)(2)a. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC Rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC, PE, PM_{10} and $PM_{2.5}$ emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b. below.
c.	OAC Rule 3745-31-05(D) Synthetic Minor Limitations to Avoid Title V Applicability and Nonattainment New Source Review	Organic compound (OC) emissions from this emissions unit shall not exceed 7.1 tons per year (TPY) over a 12-month rolling period in accordance with c)(1). See b)(2)c. and c)(1) below.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
e.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). If/when the less than 10 TPY BAT is approved, particulate matter (PM) emissions from this emissions unit shall not exceed 1.02 lbs/hr.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c. The permittee shall control organic compound emissions from this emissions unit by use of a thermal oxidizer with a minimum overall OC control efficiency of 98% by weight. This requirement shall apply whenever the permittee is using OC-containing materials.

c) Operational Restrictions

(1) The organic solvent usage rate shall not exceed 710,000 pounds per year, based on a rolling, 12-month summation for this emissions unit. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Organic Solvent Usage, pounds
1	100,000
1-2	200,000
1-3	300,000
1-4	400,000
1-5	500,000
1-6	600,000
1-7	650,000
1-8	700,000
1-9	710,000
1-10	710,000
1-11	710,000
1-12	710,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual organic solvent usage limitation shall be based upon a rolling, 12-month summation of the organic solvent usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the company identification of each organic solvent and cleanup material employed in these emissions units;

b. the amount of OC materials employed, in pounds per month;

c. the organic compound emissions, in tons per month; and

d. the updated, rolling 12-month summation of the OC emissions for this emission unit, in tons. This shall include the information for the current month and the preceding eleven months.

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

(3) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the combustion temperature on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. These records shall be maintained at the facility for a period of no less than 3 years.

(4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the 3-hour range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The 3-hour temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(5) Maintaining the Cartridge Filter

a. Cartridge Filter Maintenance Plan

The owner/operator shall develop and implement a cartridge filter maintenance plan designed to ensure that the cartridge filter continues to operate as designed. This Cartridge Filter Maintenance Plan can either be developed in-house or can be developed by the manufacturer of the cartridge filter. This Cartridge Filter Maintenance Plan shall include, at a minimum, the following elements:

i. The frequency of inspection of the cartridge filter for maintenance purposes;

ii. A description of the cartridge filter components to be inspected at each inspection. It is acceptable to have different inspection frequencies for different cartridge filter components;

iii. A description of any procedures to be used to verify the proper operation of any of the cartridge filter components to be inspected at each inspection;

iv. The identification of the record keeping form/record that will be used to track the maintenance inspection. This form/record should include, at a minimum, the following elements:

(a) Date of the maintenance inspection

(b) Name of the employee who can verify that the inspection was completed;

(c) Result of the inspection (component repaired, in need of repair, replaced, adjusted, no adjustment needed, etc.);

(d) Date component repaired, replaced or adjusted;

(e) Name of the employee who can verify that the component was repaired, replaced or adjusted;

v. A description of how and where the records shall be maintained.

The permittee shall begin using the Cartridge Filter Maintenance Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the

permittee can modify the Cartridge Filter Plan. The permittee shall submit a copy of proposed revisions to the Cartridge Filter Plan to the appropriate District Office or Local air agency (DO/LAA) for review and approval. The permittee can begin using the revised Cartridge Filter Maintenance Plan once the appropriate DO/LAA has approved its use.

b. Cartridge Filter Maintenance Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the cartridge filter components at frequencies described in the Cartridge Filter Maintenance Plan. The purpose of the inspections is to determine the need for maintenance on components of the cartridge filter. Inspections may be delayed in the case of unsafe working conditions due to weather etc. Any required inspection that is not performed due to unsafe working conditions shall be performed as soon as practical after the working conditions are considered safe.

c. Cartridge Filter Maintenance Plan Record Keeping

The permittee shall maintain records of the following information:

i. The records required to be collected under the Cartridge Filter Maintenance Plan, and

ii. The date and reason any element of the Cartridge Filter Maintenance Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of A.3. of this permit.

(6) The permit-to-install and operate (PTIO) application for this/these emissions unit, P052, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

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

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

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

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

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

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

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

Toxic Contaminant: methyl alcohol

TLV (mg/m^3): 262

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 212

MAGLC (ug/m^3): 6240

The permittee, has demonstrated that emissions of methyl alcohol, from emissions unit P052, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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

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

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

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

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

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

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

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

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

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

e) Reporting Requirements

(1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Cartridge Filter Maintenance Plan to the appropriate Ohio EPA, District Office/Local Air Agency.

(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. Combined organic solvent usage rate.

ii. Minimum average thermal oxidizer combustion temperature.

iii. Exceedance of the OC emissions limitation in b)(1)c.

b. the probable cause of each deviation (excursion);

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

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

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter. The quarterly reports shall be submitted, electronically through 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 submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this emissions unit:

a. each 3-hour period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

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

(6) 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:

Organic compound (OC) emissions from this emissions unit shall not exceed 7.1 tons per year (TPY) over a 12-month rolling period in accordance with c)(1).

Applicable Compliance Method:

The annual OC emissions shall be determined by multiplying the amount of OC material employed per month in this emission unit over the preceding 12 month period times one minus 0.98 and dividing by 2000 lbs/ton to obtain tons OC per year.

b. Emission Limitation:

Particulate matter (PE) emissions from this emissions unit shall not exceed 1.02 lbs/hr.

Applicable Compliance Method:

The PM emissions limitation was calculated by using the equation found in OAC rule 3745-17-11, Appendix A, Table I.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted to demonstrate compliance with the mass emissions limitations for particulate emissions (PE) in the appropriate averaging periods.

ii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE	Methods 1-4, 5	40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iii. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

iv. Not later than 30 days prior to the proposed test dates, the permittee shall submit an “Intent to Test” notification to the appropriate Ohio EPA District Office or local air agency. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office’s or local air agency’s refusal to accept the results of the emission tests.

v. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

vi. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may

request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

c. Emission Limitation:

Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

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

a. The emission testing shall be conducted within 18 months after the commencement of operation of this emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate for OC and the 98% OC overall control efficiency for a thermal oxidizer.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

Method 25 or Method 18 as per 40 CFR, Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

e. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person(s) who will be

conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.