



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

2/17/2016

Mr. Michael Froman  
 AKZO NOBEL COATINGS, INC.  
 1313 WINDSOR AVENUE  
 Columbus, OH 43211

Certified Mail

No	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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125040064  
 Permit Number: P0119131  
 Permit Type: Renewal  
 County: Franklin

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**
- **What should you do if you notice a spill or environmental emergency?**

**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](http://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](http://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](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 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-CDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
AKZO NOBEL COATINGS, INC.**

Facility ID:	0125040064
Permit Number:	P0119131
Permit Type:	Renewal
Issued:	2/17/2016
Effective:	2/17/2016
Expiration:	2/17/2021





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
AKZO NOBEL COATINGS, INC.

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**Final Permit-to-Install and Operate**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0119131  
**Facility ID:** 0125040064  
**Effective Date:** 2/17/2016

## Authorization

Facility ID: 0125040064  
Application Number(s): A0053693, A0054434  
Permit Number: P0119131  
Permit Description: FEPTIO Renewal permit for coating manufacturing facility.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 2/17/2016  
Effective Date: 2/17/2016  
Expiration Date: 2/17/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AKZO NOBEL COATINGS, INC.  
1313 WINDSOR AVENUE  
Columbus, OH 43211

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

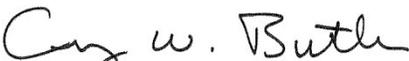
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

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: P0119131

Permit Description: FEPTIO Renewal permit for coating manufacturing facility.

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

<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	PL
Superseded Permit Number:	01-06408
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	LA-195
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J002</b>
Company Equipment ID:	Loading Rack #1
Superseded Permit Number:	P0106244
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Resin Kettle R-1000
Superseded Permit Number:	P0113140
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Resin Kettle R-2000
Superseded Permit Number:	P0113140
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P310</b>
Company Equipment ID:	FM
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P311</b>
Company Equipment ID:	W-11
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P312</b>
Company Equipment ID:	W-12
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P313</b>
Company Equipment ID:	Small Batch Portable Shaft Cleaner
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P365</b>
Company Equipment ID:	Weigh Tank #1
Superseded Permit Number:	P0113140
General Permit Category and Type:	Not Applicable



- Emissions Unit ID: P366**  
 Company Equipment ID: Weigh Tank #2  
 Superseded Permit Number: P0113140  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P367**  
 Company Equipment ID: TD-1100  
 Superseded Permit Number: P0113140  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P368**  
 Company Equipment ID: TD-1200  
 Superseded Permit Number: P0113140  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: T324**  
 Company Equipment ID: T-401  
 Superseded Permit Number: P0112975  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: T325**  
 Company Equipment ID: T-402  
 Superseded Permit Number: P0112975  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: T326**  
 Company Equipment ID: T-403  
 Superseded Permit Number: P0112975  
 General Permit Category and Type: Not Applicable

**Group Name: 3,600 Gallon Thindown Tanks**

<b>Emissions Unit ID:</b>	<b>P369</b>
Company Equipment ID:	TD-2300
Superseded Permit Number:	P0113140
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P370</b>
Company Equipment ID:	TD-2400
Superseded Permit Number:	P0113140
General Permit Category and Type:	Not Applicable

**Group Name: Large & Small Batch Filter Carts**

<b>Emissions Unit ID:</b>	<b>P258</b>
Company Equipment ID:	FC-1
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P259</b>
Company Equipment ID:	FC-2
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P260</b>
Company Equipment ID:	FC-3
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P261</b>
Company Equipment ID:	FC-4
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P315</b>
Company Equipment ID:	FC-5
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P316</b>
Company Equipment ID:	FC-6
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P317</b>
Company Equipment ID:	FC-7
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P318</b>
Company Equipment ID:	FC-8
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P319</b>
Company Equipment ID:	FC-9
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P320</b>
Company Equipment ID:	FC-10
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P321</b>
Company Equipment ID:	FC-11
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P322</b>
Company Equipment ID:	FC-12
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P323</b>
Company Equipment ID:	FC-13
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P324</b>
Company Equipment ID:	FC-14
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P325</b>
Company Equipment ID:	FC-15
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P377</b>
Company Equipment ID:	FC-16
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P378</b>
Company Equipment ID:	FC-17
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P379</b>
Company Equipment ID:	FC-18
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P380</b>
Company Equipment ID:	FC-19
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P381</b>
Company Equipment ID:	FC-20
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P382</b>
Company Equipment ID:	FC-21
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P383</b>
Company Equipment ID:	FC-22
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P384</b>
Company Equipment ID:	FC-23
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P385</b>
Company Equipment ID:	FC-24
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P386</b>
Company Equipment ID:	FC-25
Superseded Permit Number:	P0115713
General Permit Category andType:	Not Applicable

**Group Name: Large Batch Premix Tanks**

<b>Emissions Unit ID:</b>	<b>P201</b>
Company Equipment ID:	PM-241
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P203</b>
Company Equipment ID:	PM-211
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P204</b>
Company Equipment ID:	PM-221
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P205</b>
Company Equipment ID:	PM-231
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P206</b>
Company Equipment ID:	PM-251
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P207</b>
Company Equipment ID:	PM-261
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P208</b>
Company Equipment ID:	PM-271
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P209</b>
Company Equipment ID:	PM-281
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P210</b>
Company Equipment ID:	PM-291
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P211</b>
Company Equipment ID:	PM-301
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable

**Group Name: Large Batch Thindown Tanks**

<b>Emissions Unit ID:</b>	<b>P202</b>
Company Equipment ID:	TD-242
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P212</b>
Company Equipment ID:	TD-212
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P213</b>
Company Equipment ID:	TD-213
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P214</b>
Company Equipment ID:	TD-214
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P215</b>
Company Equipment ID:	TD-215
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P216</b>
Company Equipment ID:	TD-222
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P217</b>
Company Equipment ID:	TD-223
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P218</b>
Company Equipment ID:	TD-224
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P219</b>
Company Equipment ID:	TD-232
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P220</b>
Company Equipment ID:	TD-233
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P221</b>
Company Equipment ID:	TD-234
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P222</b>
Company Equipment ID:	TD-267
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P223</b>
Company Equipment ID:	TD-243
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P224</b>
Company Equipment ID:	TD-244
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P226</b>
Company Equipment ID:	TD-252
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P227</b>
Company Equipment ID:	TD-253
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P228</b>
Company Equipment ID:	TD-254
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P229</b>
Company Equipment ID:	TD-255
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P230</b>
Company Equipment ID:	TD-262
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P231</b>
Company Equipment ID:	TD-263
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P232</b>
Company Equipment ID:	TD-264
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P233</b>
Company Equipment ID:	TD-265
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P234</b>
Company Equipment ID:	TD-266
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P235</b>
Company Equipment ID:	TD-272
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P236</b>
Company Equipment ID:	TD-273
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P237</b>
Company Equipment ID:	TD-274
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P238</b>
Company Equipment ID:	TD-275
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P239</b>
Company Equipment ID:	TD-276
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P240</b>
Company Equipment ID:	TD-282
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P241</b>
Company Equipment ID:	TD-283
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P242</b>
Company Equipment ID:	TD-284
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P243</b>
Company Equipment ID:	TD-285
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P244</b>
Company Equipment ID:	TD-286
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P245</b>
Company Equipment ID:	TD-292
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P246</b>
Company Equipment ID:	TD-293
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P247</b>
Company Equipment ID:	TD-294
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P248</b>
Company Equipment ID:	TD-295
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P249</b>
Company Equipment ID:	TD-296
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P250</b>
Company Equipment ID:	TD-297
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P251</b>
Company Equipment ID:	TD-302
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P252</b>
Company Equipment ID:	TD-303
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P253</b>
Company Equipment ID:	TD-304
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P254</b>
Company Equipment ID:	TD-305
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P255</b>
Company Equipment ID:	TD-306
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P346</b>
Company Equipment ID:	PT-812
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P347</b>
Company Equipment ID:	PT-813
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P375</b>
Company Equipment ID:	TD-213
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P376</b>
Company Equipment ID:	TD-214
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P396</b>
Company Equipment ID:	TD-267
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable

**Group Name: Small & Intermix Portable Tank**

<b>Emissions Unit ID:</b>	<b>P275</b>
Company Equipment ID:	AG-701
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P276</b>
Company Equipment ID:	AG-702
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P277</b>
Company Equipment ID:	AG-703
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P278</b>
Company Equipment ID:	AG-704
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P279</b>
Company Equipment ID:	AG-705
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P280</b>
Company Equipment ID:	AG-706
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P281</b>
Company Equipment ID:	AG-707
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P282</b>
Company Equipment ID:	AG-708
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P283</b>
Company Equipment ID:	AG-709
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P284</b>
Company Equipment ID:	AG-710
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P285</b>
Company Equipment ID:	AG-711
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P286</b>
Company Equipment ID:	AG-712
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P287</b>
Company Equipment ID:	AG-713
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P288</b>
Company Equipment ID:	AG-714
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P289</b>
Company Equipment ID:	AG-715
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P290</b>
Company Equipment ID:	AG-716
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P291</b>
Company Equipment ID:	AG-717
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P305</b>
Company Equipment ID:	AG-731
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P306</b>
Company Equipment ID:	AG-732
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P307</b>
Company Equipment ID:	AG-733
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P308</b>
Company Equipment ID:	AG-734
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P326</b>
Company Equipment ID:	AG-781
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P327</b>
Company Equipment ID:	AG-782
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P328</b>
Company Equipment ID:	AG-783
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P329</b>
Company Equipment ID:	AG-784
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P330</b>
Company Equipment ID:	AG-785
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P331</b>
Company Equipment ID:	AG-786
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P332</b>
Company Equipment ID:	AG-787
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P333</b>
Company Equipment ID:	AG-788
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable



<b>Emissions Unit ID:</b>	<b>P334</b>
Company Equipment ID:	AG-789
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P335</b>
Company Equipment ID:	AG-790
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P371</b>
Company Equipment ID:	AG-736
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P387</b>
Company Equipment ID:	AG-796
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P388</b>
Company Equipment ID:	AG-797
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P389</b>
Company Equipment ID:	AG-718
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P390</b>
Company Equipment ID:	AG-719
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P391</b>
Company Equipment ID:	AG-735
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P392</b>
Company Equipment ID:	AG-791
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P393</b>
Company Equipment ID:	AG-792
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P394</b>
Company Equipment ID:	AG-793
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P395</b>
Company Equipment ID:	AG-795
Superseded Permit Number:	P0117273
General Permit Category andType:	Not Applicable

**Group Name: Strontium Chromate**

<b>Emissions Unit ID:</b>	<b>P256</b>
Company Equipment ID:	PM-751
Superseded Permit Number:	P0117247
General Permit Category andType:	Not Applicable



**Final Permit-to-Install and Operate**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0119131  
**Facility ID:** 0125040064  
**Effective Date:** 2/17/2016

<b>Emissions Unit ID:</b>	<b>P257</b>
Company Equipment ID:	PM-761
Superseded Permit Number:	P0117247
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0119131  
**Facility ID:** 0125040064  
**Effective Date:** 2/17/2016

## **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**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0119131  
**Facility ID:** 0125040064  
**Effective Date:** 2/17/2016

## **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.



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**Facility ID:** 0125040064  
**Effective Date:** 2/17/2016

## **C. Emissions Unit Terms and Conditions**

**1. F002, PL**

**Operations, Property and/or Equipment Description:**

Parking Lot/Paving (263,230 sq. ft.)

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. None.

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)	Particulate Matter emissions (PM <sub>10</sub> ) shall not exceed 6.6 tons per year (TPY).  Particulate Emissions (PE) shall not exceed 33.8 TPY
b.	OAC rule 3745-17-07(B)(4)	There shall be no visible emissions of fugitive dust from the paved roadways and/or parking areas except for a period of time not to exceed six minutes during any 60-minute observation period.  See b(2)a. – b(2)e.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the

permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- d. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
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all roads and parking areas	daily
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- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (3) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
- (4) The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. 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.
- [OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]
- 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:  
6.6 TPY of PM<sub>10</sub> and 33.8 TPY of PE  
Applicable Compliance Method:  
Compliance with fugitive PE and PM<sub>10</sub> limitations shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for paved roadways. Should further updates in AP-42 occur, the most current equations for paved roads shall be used. These emission limits in the General Permit were based on a maximum of 40,000 vehicle miles traveled per year, and a 95 % control efficiency for PE and PM<sub>10</sub>.



b. Emission Limitation:

There shall be no visible emissions of fugitive dust from the paved roadways and/or parking areas except for a period of time not to exceed six minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emissions limitation for fugitive dust from the paved roadways and/or parking areas identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

[OAC rule 3745-17-03(B)(4)] and [OAC rule 3745-17-07(B)(4)]

g) Miscellaneous Requirements

- (1) None.

**2. J001, LA-195**

**Operations, Property and/or Equipment Description:**

Resin tanker loading arm (3" OPW)

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)a., b)(2)e., b)(2)g. – b)(2)i., c)(1), d)(6), d)(7), e)(2)d., & e)(6)

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) (Synthetic Minor to avoid Title V)	See b)(2)e. and b)(2)g. – b)(2)i.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control the Volatile Organic Compound (VOC) emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer (RTO) with a designed minimum control efficiency of 97.55%.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05

was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The VOC emissions from this emissions unit shall be vented to the RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a RTO with a minimum control efficiency of 97.55%.
- e. The emissions from the loading arm (J001) shall not exceed the following:  
  
VOC      0.025 tons/year
- f. This facility shall utilize a Loading Arm VOC Concentrator/Oxidizer (hereinafter "Conc/Ox") emission factor of 4.901E-5 lbs OC/gal of throughput for emissions unit J001 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- g. Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
- h. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
- i. Emissions of Total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.
- j. The coil/extrusion coating portion of this facility includes all those emission units covered in this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month coatings production rate for the Loading Arm (emissions unit J001) shall be limited to 1,000,000 gallons. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report).

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.
- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

- (6) This facility shall maintain monthly records which list the following information for products produced for the coil/extrusion coating portion of this facility:
- a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed; and
  - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed; and
  - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed.
- (7) This facility shall maintain daily records which list the following information for all products handled by the loading arm (emissions unit J001).
- a. the number of gallons of product throughput, and
  - b. the total hours of daily operation.

e) Reporting Requirements

- (1) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC emissions for the loading arm (J001), and which document any exceedance(s) of the permitted production throughput rate and/or emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
- (2) The permittee shall submit quarterly summaries of the following records:
- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
  - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
  - d. all exceedances of the rolling, rolling 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
- (5) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
  - a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
  - b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the materials employed; and
  - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- 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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central district Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emissions Limitation:

VOC emissions from the Loading Arm (J001) shall not exceed 0.025tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

c. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

d. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).



e. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

f. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.

**3. J002, Loading Rack #1**

**Operations, Property and/or Equipment Description:**

Loading Rack LR-1 located in the resin manufacturing area

- 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)c., c)(1), d)(3) – d)(5), & e)(2)a.iii& iv
- 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), as effective 11/30/2001	<p>Volatile Organic Compounds (VOC) shall not exceed 0.12 lb/hr and 0.52 tons per year (TPY).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See b)(2)b.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	See b)(2)c.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	<p>VOC emissions from P365-P370, J002, P001, and P002 combined shall not exceed, as a rolling 12-month summation, 6.84 TPY.</p> <p>Emissions of any individual Hazardous Air Pollutant (HAP) from emissions units P365-P370, J002, P001, and P002 shall</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>not exceed 2.88 TPY, as a rolling, 12-month summation.</p> <p>See c)(1).</p> <p>All of the VOC emissions from units P365-P370, J002, P001, and P002 shall be vented to a Regenerative Thermal Oxidizer (RTO) that shall maintain a 97.55% destruction efficiency when one or more of the emissions units is in operation.</p>
d.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

- a. The hourly emissions limit is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with this limit.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

- c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOCs is less than 10 TPY.

c) Operational Restrictions

- (1) The rolling 12-month production rate for this emissions unit shall not exceed 1,000,000 gallons of resin.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the RTO, during any period of time when the emissions unit(s) controlled by the RTO is/are in operation, shall not be less than 1350 degrees Fahrenheit.
- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was below 1350 degrees Fahrenheit; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- (3) The permittee shall maintain the following daily records:
  - a. the VOC content of the resin in lbs/gallon;
  - b. the number of gallons of throughput;
  - c. the number of hours of operation;
  - d. the calculated controlled hourly emission rate, in pounds. The controlled VOC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in d)(3)a. above multiplied by the average hourly throughput (3b/3c) multiplied by the 97.55% destruction efficiency;
  - e. the calculated controlled daily VOC emission rate, in pounds, the controlled VOC emission rate shall be calculated using the pound of VOC per gallon of resin multiplied by the daily throughput (3a\*3b); and
  - f. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in tons.

- (4) The permittee shall maintain the following monthly records:
  - a. the total number of gallons of throughput;
  - b. records of the VOC emissions, in tons, for emissions units P356-P370, J002, P001 and P002; and
  - c. the rolling 12-month summation of VOC emissions, in tons, from emissions units P356-P370, J002, P001 and P002.
  
- (5) The permittee shall collect and record the following information each month for all materials containing any HAP that are processed in the emissions unit:
  - a. the name and identification number/code of each resin and any other material containing any HAP;
  - b. the name/identification of each individual HAP contained in each material processed (and identified in "a" above) and the pound(s) of each HAP per gallon of each HAP-containing material processed;
  - c. the number of gallons of each resin and other material processed during the month;
  - d. for each individual HAP, the total uncontrolled emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;
  - e. for each individual HAP, the calculated, controlled emission rate from all the materials employed, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in "d" above, multiplied by 1 minus the overall control efficiency for the control equipment (1-97.55%); and
  - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in ton(s).
  
- e) Reporting Requirements
  - (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
  - (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. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was below 1350 degrees Fahrenheit;
  - ii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - iii. any deviations from the rolling, 12-month resin throughput limitation; and
  - iv. any deviations from the rolling 12-month VOC and HAP limits;
- 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 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 (Ohio EPA, Central District Office).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.



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

b. Emissions Limitation:

0.12 lb/hr and 0.52 TPY VOC; facility-wide rolling, 12-month VOC limit of 6.84 TPY and facility-wide rolling, 12-month HAP limit of 2.88 TPY.

Applicable Compliance Method:

Compliance with the short term limitation of 0.12 lbs/hr shall be demonstrated by multiplying the uncontrolled VOC emission factor of 1.04E-03 lb-VOC/gal resin by the total throughput of resin divided by 8,760 hours per year.

Compliance with the long term limitation of 0.52 TPY shall be demonstrated by multiplying short term VOC limit of 0.12 lb/hr by 8,760 hours of operation and dividing by 2,000 pounds per ton.

Compliance with the facility-wide rolling, 12-month VOC and HAP limits shall be demonstrated by maintaining the records required in d)(3), (4), and (5) above.

g) Miscellaneous Requirements

(1) None.

**4. P001, Resin Kettle R-1000**

**Operations, Property and/or Equipment Description:**

1,000 gal resin kettle

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)b. – b)(2)c., c)(1), d)(1), d)(3), e)(1)d. and e)(5)

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>Volatile Organic Compounds (VOC) emissions shall not exceed 3.95E-03 pound per gallon of resin and 2.37 tons per year (TPY) as a rolling, 12-month summation.</p> <p>See b)(2)b. – b)(2)c.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 7.58 pounds per hour.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. Usage of any individual Hazardous Air Pollutant (HAP) shall not exceed 42% of the total VOC employed by this emissions unit.
- b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.
- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The condenser system controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 85% when the emissions unit is in operation. The condenser system includes the condenser and the foam over tank.
- f. The emissions from this emissions unit shall be vented to the venturi scrubber at all times the reactor hatch is open.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,200,000 gallons of resin.  
  
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 production rate, upon issuance of this permit.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the venturi scrubber, that shall be maintained in order to demonstrate compliance, shall not be less than 3.0 inches of water.
- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable venturi scrubber water flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 60 gallons per minute.
- (4) The average temperature of the exhaust gases from the condenser system, for any 3-hour block of time when the emission unit(s) controlled by the condenser system is/are in operation, shall not exceed 101 degrees Fahrenheit.

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

- (1) The permittee shall maintain monthly records of the following information:
  - a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (2) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26th, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (3) The permittee shall maintain the following daily records:
  - a. number of gallons of throughput;
  - b. the maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
  - c. the total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds;
  - d. the total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds; and
  - e. the total emissions of VOC from emission unit P001, in pounds.
- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the venturi scrubber (in inches of water) and the venturi scrubber water flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the venturi scrubber and the water flow rate on 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.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 pressure drop and flow rate 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.

These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for this/these emissions unit(s). In addition, approved revisions to the range or 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) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser system when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the condenser system was/were in operation, during which the average temperature of the exhaust gases from the condenser system exceeded the range/limit established in accordance with this permit; and
- b. a log or record of operating time for the capture (collection) system, condenser system, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (6) Whenever the monitored temperature of the exhaust gases from the condenser system deviates from the range/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 deviation;
- j. the temperature readings of the exhaust gas from condenser system 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.

- (7) The exhaust gas temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. The permittee may request revisions to the permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
- each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, scrubber water flow rate or condenser system was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - any records of downtime (date and length of time) for the capture (collection) system, the venturi scrubber, the condenser system, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
  - a log of the operating time for the capture system, each control device, monitoring equipment, and the emissions unit(s);
  - all exceedances of the rolling, 12-month limitation of the production rate;
  - an identification of each day during which the usage of any individual HAP exceeded 42% of the total VOC employed by this emissions unit and the actual percentage of the total VOC employed for each such day; and
  - the results of the pound of VOC per gallon of resin emission rate analysis required by d)(2) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office 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. It is recommended that the PER is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the condenser system during the 12-month reporting period for this/these emissions unit(s):

- a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the condenser system was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the condenser system;
  - 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(s) into compliance and/or the temperature of the exhaust gases from the condenser system 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), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - 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 pressure drop, or liquid flow rate into compliance with the appropriate range or limit contained in this permit, 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), as identified in the monitoring and record keeping requirements of this permit.
- (5) The permittee shall also submit annual reports which:
- a. specify the total VOC emissions from this emissions unit for the previous calendar year;
  - b. specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day;

- c. specify the total annual throughput of resin;
- d. specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002; and
- e. specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

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 Limitations:

Particulate emissions shall not exceed 7.58 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 5.

b. Emission Limitation:

Volatile Organic Compounds (VOC) emissions shall not exceed 3.95E-03 pound per gallon of resin.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d)(2) above.

c. Emission Limitation:

Volatile Organic Compounds (VOC) emissions shall not exceed 2.37 tons per year as a rolling 12 month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

d. Emission Limitation:

Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

e. Emission Limitation:

Usage of any individual HAP shall not exceed 42% of the total VOC employed by this emissions unit.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

f. Emission Limitation:

Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

g. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

Applicable Compliance Method:

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

h. Emission Limitation:

The condenser system controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 85% when the emissions unit is in operation.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 18.

g) Miscellaneous Requirements

- (1) None.

**5. P002, Resin Kettle R-2000**

**Operations, Property and/or Equipment Description:**

2,000 gal resin kettle

- 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)b. – b)(2)c, c)(1), d)(1), d)(3), e)(1)d., & e)(5)
- 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>Volatile Organic Compounds (VOC) emissions shall not exceed 3.95E-03 pound per gallon of resin and 3.36 tons per year (TPY) as a rolling, 12-month summation.</p> <p>See b)(2)b. – b)(2)c.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 13.6 pounds per hour.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. Usage of any individual Hazardous Air Pollutant (HAP) shall not exceed 42% of the total VOC employed by this emissions unit.
- b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.
- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The condenser system controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 85% when the emissions unit is in operation. The condenser system includes the condenser and the foam over tank.
- f. The emissions from this emissions unit shall be vented to the venturi scrubber at all times the reactor hatch is open.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,700,000 gallons of resin.

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 production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the venturi scrubber, that shall be maintained in order to demonstrate compliance, shall not be less than 3.0 inches of water.
- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable venturi scrubber water flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 60 gallons per minute.
- (4) The average temperature of the exhaust gases from the condenser system, for any 3-hour block of time when the emission unit(s) controlled by the condenser system is/are in operation, shall not exceed 101 degrees Fahrenheit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the production rate for each month; and

- b. the rolling, 12-month summation of the production rates.
- (2) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26th, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (3) The permittee shall maintain the following daily records:
- a. number of gallons of throughput;
  - b. the maximum amount of each individual HAP, employed, as a percentage of the total OC employed during the day;
  - c. the total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds;
  - d. the total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds.; and
  - e. the total emissions of VOC from emission unit P002, in pounds.
- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the venturi scrubber (in inches of water) and the venturi scrubber water flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the venturi scrubber and the water flow rate on 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.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 pressure drop and flow rate 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.

These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for this/these emissions unit(s). In addition, approved revisions to the range or 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) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser system when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the condenser system was/were in operation, during which the average temperature of the exhaust gases from the condenser system exceeded the range/limit established in accordance with this permit; and

- b. a log or record of operating time for the capture (collection) system, condenser system, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (6) Whenever the monitored temperature of the exhaust gases from the condenser system deviates from the range/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 deviation;
- j. the temperature readings of the exhaust gas from condenser system 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.

- (7) The exhaust gas temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. The permittee may request revisions to the permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, scrubber water flow rate or condenser system was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the venturi scrubber, the condenser system, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
  - c. a log of the operating time for the capture system, each control device, monitoring equipment, and the emissions unit(s);
  - d. all exceedances of the rolling, rolling 12-month limitation of the production rate;
  - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total VOC employed by this emissions unit and the actual percentage of the total OC employed for each such day; and
  - f. the results of the pound of VOC per gallon of resin emission rate analysis required by d)(2) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office 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. It is recommended that the PER is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the condenser system during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the condenser system was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the condenser system;

- 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(s) into compliance and/or the temperature of the exhaust gases from the condenser system 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), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber or the liquid flow rate, was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - 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 pressure drop or liquid flow rate into compliance with the appropriate range or limit contained in this permit, 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), as identified in the monitoring and record keeping requirements of this permit.
- (5) The permittee shall also submit annual reports which:
- a. specify the total VOC emissions from this emissions unit for the previous calendar year;
  - b. specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day;
  - c. specify the total annual throughput of resin;
  - d. specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002; and
  - e. specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

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 Limitations:

Particulate emissions shall not exceed 13.6 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 5.

b. Emission Limitation:

Volatile Organic Compounds (VOC) emissions shall not exceed 3.95E-03 pound per gallon of resin.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d)(2) above.

c. Emission Limitation:

Volatile Organic Compounds (VOC) emissions shall not exceed 3.36 tons per year as a rolling 12 month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

d. Emission Limitation:

Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

e. Emission Limitation:

Usage of any individual HAP shall not exceed 42% of the total VOC employed by this emissions unit.



Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

f. Emission Limitation:

Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(3) above.

g. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

Applicable Compliance Method:

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

h. Emission Limitation:

The condenser system controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 85% when the emissions unit is in operation.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 18.

g) Miscellaneous Requirements

- (1) None.

**6. P310, FM**

**Operations, Property and/or Equipment Description:**

Floor Mopping

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)a., b)(2)c., b)(2)g. – b)(2)i., c)(1), d)(2) & e)(3)

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)	See b)(2)c. and b)(2)g. – b)(2)i.,
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emission limitation established by this rule is equal to or less stringent than OAC rule 3745-31-05(D)
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as

part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the Volatile Organic compounds (VOC) emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The emissions from emissions unit P310 shall not exceed the following:  

Volatile Organic Compounds (VOC)	2.19 tons/year
----------------------------------	----------------
- d. This facility shall utilize a Floor Mop VOC Small Batch Fugitive Stack emission factor of 7.84 lbs VOC/gal of material evaporated from this emissions unit in the Small Batch Production Area, unless otherwise approved in writing by Ohio EPA, Central District Office (CDO). This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- e. This facility shall utilize a Floor Mop VOC Truck Bay Door emission factor of 0.16 lbs OC/gal of material evaporated from this emissions unit, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- f. This facility shall utilize a Floor Mop VOC Large Batch Fugitive Stack emission factor of 7.84 lbs OC/gal of material evaporated from this emissions unit in the Large Batch Production Area, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- g. Emissions of any individual Hazardous Air Pollutants (HAP) from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
- h. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
- i. Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month material usage rate for emission unit P310 shall be limited to 548 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) This facility shall maintain daily records which list the following information for materials evaporated in this emissions unit, P310:
  - a. the number of gallons of reclaim solvent evaporated;
  - b. the production area where the floor was mopped; and
  - c. the total hours of daily operation.
- (2) This facility shall maintain monthly records which list the following information for products produced in the for the coil/extrusion coating portion of this facility:
  - a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed;
  - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed; and
  - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC emissions for emissions unit P310, and which document any exceedance(s) of the permitted production throughput rate and/or emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
  - b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the materials employed; and
  - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.

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. Emissions Limitation:

VOC emissions from emissions unit P310 shall not exceed 2.19tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(3) above).

b. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling 12 month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(3) above).

c. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.



Applicable Compliance:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(3) above).

d. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

e. Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(3) above).

g) Miscellaneous Requirements

(1) None.

**7. P311, W-11**

**Operations, Property and/or Equipment Description:**

SRS Sample Container and Pail Washer

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)a., b)(2)e. and b)(2)i. – b)(2)k., c)(1), d)(6) & e)(4)

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)	See b)(2)e. and b)(2)i. – b)(2)k.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control Volatile Organic Compounds (VOC) emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer (RTO) with a designed minimum control efficiency of 97.55%.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265

changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The VOC emissions from this emissions unit shall be vented to the RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a RTO with a minimum control efficiency of 97.55%.
- e. The emissions from P311 shall not exceed the following:  
  
VOC      0.09 tons/year
- f. This facility shall utilize a Pail Washer Truck Bay Door emission factor of 3.828E-5 lbs VOC/cycle for emissions unit P311, unless otherwise approved in writing by Ohio EPA, Central District Office (CDO). This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- g. This facility shall utilize a Pail Washer Small Batch Fugitive Stack emission factor of 9.379 E-4lbs VOC/cycle for emissions unit P311, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- h. This facility shall utilize a Pail Washer Conc/Ox emission factor of 2.28E-3 lbs VOC/cycle for emissions unit P311, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- i. Emissions of any individual Hazardous Air Pollutants (HAP) from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
- j. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

- k. Emissions of Total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.
  - c) Operational Restrictions
    - (1) Thepailwasher,emissions unitP311,shallbelimitedtoonehundredtwenty(120)cycles perday.
  - d) Monitoring and/or Recordkeeping Requirements
    - (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.
    - (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
      - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
      - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- These records shall be maintained at the facility for a period of three years.
- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

- (6) This facility shall maintain monthly records which list the following information for products produced in the portion of this facility: for the coil/extrusion coating
- a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed;
  - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed; and
  - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed.
- (7) This facility shall maintain daily records which list the following information for Emissions Unit P311:
- a. the types of solvents including density employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit for each emissions unit;
  - b. the gallons of solvent disposed of as waste;
  - c. the number of cycles of the emissions unit; and
  - d. the total hours of daily operation of the emissions unit.
- e) Reporting Requirements
- (1) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC emissions for emissions unit P311, and which documents any exceedance(s) of the permitted production throughput rate and/or emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. The PER must be completed electronically and submitted via the Ohio EPA e-Business 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.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;

- b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the materials employed; and
- c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.



Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emissions Limitation:

VOC emissions from emissions unit P311 shall not exceed 0.09ton per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

c. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

d. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.



Applicable Compliance:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

e. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

g) Miscellaneous Requirements

- (1) None.

**8. P312, W-12**

**Operations, Property and/or Equipment Description:**

Hockmeyer Portable Tank Washer

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)a., b)(2)e. and b)(2)i. – b)(2)k., c)(1), d)(6), e)(2)d., & e)(6)

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)	See b)(2)e. and b)(2)i. – b)(2)k.,
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control Volatile Organic Compounds (VOC) emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer (RTO) with a designed minimum control efficiency of 97.55%.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265

changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The VOC emissions from this emissions unit shall be vented to the RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.
- e. The emissions from emission unit P312 shall not exceed the following:  

VOC	2.28 tons/year
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- f. This facility shall utilize a Portable Tank Washer Small Batch Fugitive Stack emission factor of 1.535E-1 lb. VOC/cycle for emission unit P312, unless otherwise approved in writing by Ohio EPA, Central District Office (CDO). This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- g. This facility shall utilize a Portable Tank Washer Truck Bay Door emission factor of 6.266E-3 lbs VOC/cycle for emission unit P312, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- h. This facility shall utilize a Portable Tank Washer Conc/Ox emission factor of 2.39E-2 lbs. VOC/cycle for emission unit P312, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- i. Emissions of any individual Hazardous Air Pollutant (HAP) from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

- j. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
  - k. Emissions of Total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.40 tons per year, as a rolling, 12-month summation.
- c) Operational Restrictions
- (1) The maximum rolling, 12-month coatings production rate for the Large Batch Production Area (emissions unit P312) shall be limited to 13,505 cleanings.
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.
  - (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
    - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
    - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- These records shall be maintained at the facility for a period of three years.
- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air

contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

- (6) This facility shall maintain monthly records which list the following information for products produced in the for the coil/extrusion coating portion of this facility:
- a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed;
  - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed; and
  - c. calculations showing the rolling, 12-month total VOC emission limitation for all the materials employed.
- (7) This facility shall maintain daily records which list the following information for emissions unit P312:
- a. the number of tank cleanings (batches); and
  - b. the total hours of daily operation of this emissions unit.

e) Reporting Requirements

- (1) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC emissions from emission unit P312, and which documents any exceedance(s) of the permitted cleaning rate and/or emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
- (2) The permittee shall submit quarterly summaries of the following records:
- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
  - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
  - d. all exceedances of the rolling, 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
  - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. The PER must be completed electronically and submitted via the Ohio EPA e-Business 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.
  - (5) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
    - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
    - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
    - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
  - (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
    - a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
    - b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the materials employed; and
    - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- 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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).



Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emissions Limitation:

VOC emissions from emission unit P312 shall not exceed 2.28 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

c. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

d. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

e. Emission Limitation:



**Final Permit-to-Install and Operate**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0119131  
**Facility ID:** 0125040064  
**Effective Date:** 2/17/2016

Emissions of Total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

- g) Miscellaneous Requirements
  - (1) None.

**9. P313, Small Batch Portable Shaft Cleaner**

**Operations, Property and/or Equipment Description:**

Small Batch Portable Mixer Shaft Cleaning

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)a., b)(2)c., b)(2)f. – b)(2)h., c)(1), d)(6), and e)(4)

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)	See b)(2)c. and b)(2)f. – b)(2)h
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emission limitation established by this rule is equal to or less stringent than OAC rule 3745-31-05(D).  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan

(SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The emissions from emissions unit P313 shall not exceed the following:
 

Volatile Organic Compounds (VOC)	3.42 tons/year
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- d. This facility shall utilize a Shaft Cleaning Truck Bay Door emission factor of 5.00 x 10<sup>-3</sup> lbs VOC/shaft cleaning for emission unit P313, unless otherwise approved in writing by Ohio EPA, Central District Office (CDO). This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- e. This facility shall utilize a Shaft Cleaning Batch Fugitive Stack emission factor of 1.225 E-01 lbs VOC/shaft cleaning for emission unit P313, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- f. Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
- g. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
- h. Emissions of total Hazardous Air Pollutants (HAP) from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.40 tons per year, as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month rate for the Shaft Cleaning Process, emissions units P313, shall be limited to 27,375 cleanings.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- (6) This facility shall maintain monthly records which list the following information for products produced in the for the coil/extrusion coating portion of this facility:
  - a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed;
  - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed; and
  - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed.

- (7) This facility shall maintain daily records which list the following information for emissions unit P313:
- a. the number of shaft cleanings (batches); and
  - b. the total hours of daily operation of this emissions unit.
- e) Reporting Requirements
- (1) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC emissions for emission unit P313, and which documents any exceedance(s) of the permitted production throughput rate and/or emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
  - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
  - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
  - (4) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
    - a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
    - b. all exceedances of the rolling, 12-month total combined HAP emission limitation for all the materials employed; and
    - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- 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. Emissions Limitation:  
VOC emissions from emission unit P313 shall not exceed 3.42 tons per year.



Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

b. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

c. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

d. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

g) Miscellaneous Requirements

- (1) None.



**10. P365, Weigh Tank #1**

**Operations, Property and/or Equipment Description:**

525 Gallon Weigh 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)b. – b)(2)c., c)(1), d)(4), d)(6), e)(1)d., & e)(4)

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>Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.0153 ton per year as a rolling, 12-month summation.</p> <p>See b)(2)b. – b)(2)c.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual Hazardous Air Pollutant (HAP) shall not exceed 42% of the total VOC employed by this emissions unit.

b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The Regenerative Thermal Incinerator (RTO) controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,200,000 gallons of resin.

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 production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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.

- (4) The permittee shall maintain monthly records of the following information:
    - a. the production rate for each month; and
    - b. the rolling, 12-month summation of the production rates.
  - (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
  - (6) The permittee shall maintain the following daily records:
    - a. number of gallons of throughput;
    - b. the maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
    - c. the total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds;
    - d. the total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds; and
    - e. the total emissions of VOC from emission unit P365, in pounds.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
    - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s);
    - d. all exceedances of the rolling, 12-month limitation of the production rate;
    - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total VOC employed by this emissions unit and the actual percentage of the total OC employed for each such day; and

- f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office 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. It is recommended that the PER is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which:
- a. specify the total VOC emissions from this emissions unit for the previous calendar year;
  - b. specify the maximum amount of individual HAP employed as a percentage of the total VOC employed during any day;
  - c. specify the total annual throughput of resin;
  - d. specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002; and

- e. specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District



Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emission Limitation:

Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d)(5) above.

c. Emission Limitation:

VOC emissions shall not exceed 0.0153 tons per year as a rolling, 12-month summation.

Applicable compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

d. Emission Limitation:

Emissions of any individual HAP from emissions units P365-370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.



e. Emission Limitation:

Usage of any individual HAP shall not exceed 42% of the total VOC employed by this emissions unit.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

f. Emission Limitation:

Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None.

**11. P366, Weigh Tank #2**

**Operations, Property and/or Equipment Description:**

800 Gallon Weigh 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)b. – b)(2)c, c)(1), d)(4), d)(6), e)(1)d, & e)(4)

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>Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.0217 ton per year (TPY) as a rolling, 12-month summation.</p> <p>See b)(2)b – b)(2)c.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual Hazardous Air Pollutant (HAP) shall not exceed 42% of the total VOC employed by this emissions unit.

b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The Regenerative Thermal Oxidizer (RTO) controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,700,000 gallons of resin.

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 production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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.

- (4) The permittee shall maintain monthly records of the following information:
    - a. the production rate for each month; and
    - b. the rolling, 12-month summation of the production rates.
  - (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing, which demonstrated that the emissions unit was in compliance.
  - (6) The permittee shall maintain the following daily records:
    - a. number of gallons of throughput;
    - b. the maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
    - c. the total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds;
    - d. the total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds; and
    - e. the total emissions of VOC from emission unit P366, in pounds.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
    - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s);
    - d. all exceedances of the rolling, 12-month limitation of the production rate;
    - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total VOC employed by this emissions unit and the actual percentage of the total VOC employed for each such day; and

- f. the results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office 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. It is recommended that the PER is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which:
  - a. specify the total VOC emissions from this emissions unit for the previous calendar year;
  - b. specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day;
  - c. specify the total annual throughput of resin;
  - d. specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002; and

- e. specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District



Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emission Limitation:

VOC emissions shall not exceed 2.55E-05 pound per gallon of resin.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d)(5) above.

c. Emission Limitation:

VOC emissions shall not exceed 0.0217 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of values obtained from d)(6) above.

d. Emission Limitation:

Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of values obtained from d)(6) above.



e. Emission Limitation:

Usage of any individual HAP shall not exceed 42% of the total VOC employed by this emissions unit.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of values obtained from d)(6) above.

f. Emission Limitation:

Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None.

**12. P367, TD-1100**

**Operations, Property and/or Equipment Description:**

2,000 Gallon Letdown 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)b. – b)(2)c., c)(1), d)(4), d)(6), e)(1)d., & e)(4)

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>Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 4.4E-03 ton per year (TPY) as a rolling, 12-month summation.</p> <p>See b)(2)b. – b)(2)c.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual Hazardous Air Pollutants (HAP) shall not exceed 42% of the total OC employed by this emissions unit.

b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The Regenerative Thermal Oxidizer (RTO) controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 200,000 gallons of resin.

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 production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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.

- (4) The permittee shall maintain monthly records of the following information:
    - a. the production rate for each month; and
    - b. the rolling, 12-month summation of the production rates.
  - (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
  - (6) The permittee shall maintain the following daily records:
    - a. number of gallons of throughput;
    - b. the maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
    - c. the total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds;
    - d. the total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds; and
    - e. the total emissions of VOC from emission unit P367, in pounds.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
    - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s);
    - d. all exceedances of the rolling, 12-month limitation of the production rate;
    - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day; and

- f. the results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office 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. It is recommended that the PER is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which:
  - a. specify the total VOC emissions from this emissions unit for the previous calendar year;
  - b. specify the maximum amount of individual HAP employed as a percentage of the total OC employed during any day;
  - c. specify the total annual throughput of resin;
  - d. specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002; and

- e. specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District



Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emission Limitation:

VOC emissions shall not exceed 2.55E-05 pound per gallon of resin.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d)(5) above.

c. Emission Limitation:

VOC emissions shall not exceed 4.4E-03 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

d. Emission Limitation:

Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.



e. Emission Limitation:

Usage of any individual HAP shall not exceed 42% of the total VOC employed by this emissions unit.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

f. Emission Limitation:

Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None.

**13. P368, TD-1200**

**Operations, Property and/or Equipment Description:**

2,400 Gallon Letdown 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)b. – b)(2)c., c)(1), d)(4), d)(6), e)(1)d., & e)(4)

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>Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.01 ton per year (TPY) as a rolling, 12-month summation.</p> <p>See b)(2)b. – b)(2)c.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual Hazardous Air Pollutant (HAP) shall not exceed 42% of the total VOC employed by this emissions unit.

b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The Regenerative Thermal Oxidizer (RTO) controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) Operational Restrictions

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 1,000,000 gallons of resin.

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 production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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.

- (4) The permittee shall maintain monthly records of the following information:
    - a. the production rate for each month; and
    - b. the rolling, 12-month summation of the production rates.
  - (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
  - (6) The permittee shall maintain the following daily records:
    - a. number of gallons of throughput;
    - b. the maximum amount of each individual HAP employed, as a percentage of the total OC employed during the day;
    - c. the total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds;
    - d. the total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds; and
    - e. the total emissions of VOC from emission unit P368, in pounds.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
    - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s);
    - d. all exceedances of the rolling, 12-month limitation of the production rate;
    - e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day; and

- f. The results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to EPA, Central District Office 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. It is recommended that the PER is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which:
- a. specify the total VOC emissions from this emissions unit for the previous calendar year;
  - b. specify the maximum amount of individual HAP employed as a percentage of the total VOC employed during any day;
  - c. specify the total annual throughput of resin;
  - d. specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002; and

- e. specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District



Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emission Limitation:

VOC emissions shall not exceed 2.55E-05 pound per gallon of resin.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d)(5) above.

c. Emission Limitation:

VOC emissions shall not exceed 0.01 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

d. Emission Limitation:

Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated through the summation of the values obtained from d)(6) above.



e. Emission Limitation:

Usage of any individual HAP shall not exceed 42% of the total VOC employed by this emissions unit.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

f. Emission Limitation:

Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

- (1) None.

**14. T324, T-401**

**Operations, Property and/or Equipment Description:**

5000 gallon intermediate storage 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)(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)a., b)(2)d., c)(1), d)(5), & e)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 7.2E-4 ton per rolling, 12-month period.  See b)(2)d. & c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-09(L)(1)(a)(ii)	Compliance with the requirements of this rule is satisfied through compliance with b)(2)e.
e.	40 CFR Part 60, Subpart Kb	This emissions unit is exempt from the requirements of this rule. (Tank Capacity less than 75 m <sup>3</sup> (19,815 gal))

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. All of the VOC emissions from this emissions unit shall be vented to a Regenerative Thermal Oxidizer (RTO) that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. Based on the maximum throughput of 350,000 gallons, the hourly and annual emissions limitations for all pollutants were established to reflect the potential to emit, as defined in OAC rule 3745-31-01, for the emissions unit, as well as for the control device.
- e. The permittee shall control VOC emissions from this emissions unit through the use of the RTO with a minimum control efficiency of 97.55%.

c) Operational Restrictions

- (1) The maximum annual production rate for this emissions unit shall not exceed 350,000 gallons, based upon a rolling, 12-month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) The permittee shall maintain monthly records of the following information:
  - a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;

- c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
- d. all exceedances of the rolling, 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
  - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
  - (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
    - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
    - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
    - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- 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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emission Limitations:

VOC emissions shall not exceed 7.2E-4 ton per rolling, 12-month period.

Applicable Compliance Method:

- c. Compliance with the annual mass emissions limitations shall be demonstrated through the results of calculations performed using the most recent version of USEPA's "Tanks Program" or AP-42 emission factors for working and breathing loss calculations and consideration of the control efficiency of the RTO.

g) Miscellaneous Requirements

- (1) None.

**15. T325, T-402**

**Operations, Property and/or Equipment Description:**

5000 gallon intermediate storage 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)(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)a., b)(2)d., c)(1), d)(5), & e)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 9.8E-4 ton per rolling, 12-month period.  See b)(2)d. & c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-09(L)(1)(a)(ii)	Compliance with the requirements of this rule is satisfied through compliance with b)(2)e below.
e.	40 CFR Part 60, Subpart Kb	This emissions unit is exempt from the requirements of this rule. (Tank capacity less than 75 m <sup>3</sup> (19,815 gal))

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. All of the VOC emissions from this emissions unit shall be vented to the Regenerative Thermal Oxidizer (RTO) that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. Based on the maximum throughput of 177,000 gallons, the hourly and annual emissions limitations for all pollutants were established to reflect the potential to emit, as defined in OAC rule 3745-31-01, for the emissions unit, as well as for the control device.
- e. The permittee shall control VOC emissions from this emissions unit through the use of the RTO with a minimum control efficiency of 97.55%.

c) Operational Restrictions

- (1) The maximum annual production rate for this emissions unit shall not exceed 177,000 gallons, based upon a rolling, 12-month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) The permittee shall maintain monthly records of the following information:
    - a. the production rate for each month; and
    - b. the rolling, 12-month summation of the production rates.
  - (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;

- c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
- d. all exceedances of the rolling, 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
  - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
  - (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
    - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
    - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
    - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- 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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emission Limitations:

VOC emissions shall not exceed 9.8E-4 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual mass emissions limitations shall be demonstrated through the results of calculations performed using the most recent version of USEPA's "Tanks Program" or AP-42 emission factors for working and breathing loss calculations and consideration of the control efficiency of the RTO.

g) Miscellaneous Requirements

(1) None.

**16. T326, T-403**

**Operations, Property and/or Equipment Description:**

5000 gallon intermediate storage 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)(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)a., b)(2)d., c)(1), d)(5), & e)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions shall not exceed 2.5E-4 ton per rolling, 12-month period.  See b)(2)d. & c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-21-09(L)(1)(a)(ii)	Compliance with the requirements of this rule is satisfied through compliance with b)(2)e.
e.	40 CFR Part 60, Subpart Kb	This emissions unit is exempt from the requirements of this rule. (Tank capacity less than 75 m <sup>3</sup> (19,815 gal))

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. All of the VOC emissions from this emissions unit shall be vented to the Regenerative Thermal Oxidizer (RTO) that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. Based on the maximum throughput of 350,000 gallons, the hourly and annual emissions limitations for all pollutants were established to reflect the potential to emit, as defined in OAC rule 3745-31-01, for the emissions unit, as well as for the control device.
- e. The permittee shall control VOC emissions from this emissions unit through the use of the RTO with a minimum control efficiency of 97.55%.

c) Operational Restrictions

- (1) The maximum annual production rate for this emissions unit shall not exceed 350,000 gallons, based upon a rolling, 12-month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) The permittee shall maintain monthly records of the following information:
    - a. the production rate for each month; and
    - b. the rolling, 12-month summation of the production rates.
  - (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;

- c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
- d. all exceedances of the rolling, 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
  - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
  - (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
    - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
    - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
    - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- 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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emission Limitations:

VOC emissions shall not exceed 2.5E-4 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual mass emissions limitations shall be demonstrated through the results of calculations performed using the most recent version of USEPA's "Tanks Program" or AP-42 emission factors for working and breathing loss calculations and consideration of the control efficiency of the RTO.

g) Miscellaneous Requirements

(1) None.

**17. Emissions Unit Group -3,600 Gallon Thindown Tanks: P369 & P370**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P369	3,600 Gallon Letdown Tank, TD-2300
P370	3,600 Gallon Letdown Tank, TD-2400

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)b. – b)(2)c., c)(1), d)(4), d)(6), e)(1)d, & e)(4)

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>Volatile Organic Compounds (VOC) emissions shall not exceed 2.55E-05 pound per gallon of resin and 0.01 ton per year (TPY) as a rolling, 12-month summation.</p> <p>See b)(2)b. – b)(2)c.</p>
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. Usage of any individual Hazardous Air Pollutants (HAP) shall not exceed 42% of the total VOC employed by this emissions unit.

- b. Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.
- c. Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.
- d. The pound of VOC per gallon of resin emission limit established in b)(1) above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 26<sup>th</sup>, 2013.
- e. The Regenerative Thermal Incinerator (RTO) controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

c) **Operational Restrictions**

- (1) The rolling, 12-month production rate for this emissions unit shall not exceed 850,000 gallons of resin.

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 production rate, upon issuance of this permit.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

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

- (1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and

- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (2) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (3) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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.

- (4) The permittee shall maintain monthly records of the following information:
  - a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (5) The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 26<sup>th</sup>, 2013 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.
- (6) The permittee shall maintain the following daily records:
  - a. number of gallons of throughput;
  - b. the maximum amount of each individual HAP employed, as a percentage of the total VOC employed during the day;
  - c. the total emissions of each individual HAP from the emissions units P365-P370, J002, P001 and P002, in pounds;
  - d. the total emissions of VOC from emission units P365-P370, J002, P001 and P002, in pounds; and
  - e. the total emissions of VOC from emission unit P369, in pounds.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
  - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s);
  - d. all exceedances of the rolling, 12-month limitation of the production rate;

- e. an identification of each day during which the usage of any individual HAP exceeded 42% of the total VOC employed by this emissions unit and the actual percentage of the total VOC employed for each such day; and
- f. the results of the pound of VOC per gallon of resin emission rate analysis required by d)(5) above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office 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. It is recommended that the PER is submitted electronically through Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall also submit annual reports which:
  - a. specify the total VOC emissions from this emissions unit for the previous calendar year;
  - b. specify the maximum amount of individual HAP employed as a percentage of the total VOC employed during any day;
  - c. specify the total annual throughput of resin;

- d. specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002; and
- e. specify the total emissions of individual HAP from emissions units P365-P370, J002, P001 and P002.

These reports shall be submitted by January 31 of each year.

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

- Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.



Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emission Limitation:

VOC emissions shall not exceed 2.55E-05 pound per gallon of resin.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emissions analysis required by d)(5) above.

c. Emission Limitation:

VOC emissions shall not exceed 0.01 ton per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

d. Emission Limitation:

Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.88 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.



e. Emission Limitation:

Usage of any individual HAP shall not exceed 42% of the total VOC employed by this emissions unit.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

f. Emission Limitation:

Emissions of VOC from emissions units P365-P370, J002, P001 and P002 shall not exceed 6.84 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

g. Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from d)(6) above.

g) Miscellaneous Requirements

(1) None.

18. **Emissions Unit Group - Large & Small Batch Filter Carts: P258, P259, P260, P261, P315, P316, P317, P318, P319, P320, P321, P322, P323, P324, P325, P377, P378, P379, P380, P381, P382, P383, P384, P385, & P386**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P258	Filter Cart Cleaning/Filling Process, FC-1
P259	Filter Cart Cleaning/Filling Process, FC-2
P260	Filter Cart Cleaning/Filling Process, FC-3
P261	Filter Cart Cleaning/Filling Process, FC-4
P315	Filter Cart Cleaning/Filling Process, FC-5
P316	Filter Cart Cleaning/Filling Process, FC-6
P317	Filter Cart Cleaning/Filling Process, FC-7
P318	Filter Cart Cleaning/Filling Process, FC-8
P319	Filter Cart Cleaning/Filling Process, FC-9
P320	Filter Cart Cleaning/Filling Process, FC-10
P321	Filter Cart Cleaning/Filling Process, FC-11
P322	Filter Cart Cleaning/Filling Process, FC-12
P323	Filter Cart Cleaning/Filling Process, FC-13
P324	Filter Cart Cleaning/Filling Process, FC-14
P325	Filter Cart Cleaning/Filling Process, FC-15
P377	Filter Cart Cleaning/Filling Process, FC-16
P378	Filter Cart Cleaning/Filling Process, FC-17
P379	Filter Cart Cleaning/Filling Process, FC-18
P380	Filter Cart Cleaning/Filling Process, FC-19
P381	Filter Cart Cleaning/Filling Process, FC-20
P382	Filter Cart Cleaning/Filling Process, FC-21
P383	Filter Cart Cleaning/Filling Process, FC-22
P384	Filter Cart Cleaning/Filling Process, FC-23
P385	Filter Cart Cleaning/Filling Process, FC-24
P386	Filter Cart Cleaning/Filling Process, FC-25

- 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)
- (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)k. – b)(2)n., c(1), d)(5), d)(8) - d)(9), e)(1)d., & e)(6)

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)	See b)(2)k. – b)(2)n.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control Volatile Organic Compounds (VOC) emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer (RTO) with a designed minimum control efficiency of 97.55%.  See b)(2)a.
	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
	OAC rule 3745-21-07(M)(1) and (2)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.

- c. The VOC emissions from this emissions unit shall be vented to the RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.
- e. This facility shall utilize a Filter Cart VOC Large Batch Fugitive Stack emission factor of  $7.784E-6$  lbs VOC/gal of product produced in the Large Batch Production Area for emissions units, P258-P261, P315-P325, and P377-P386, unless otherwise approved in writing by Ohio EPA, Central District Office (CDO). This emission factor was developed in accordance with the permit application submitted August 5<sup>th</sup>, 1998 for the Coil/Extrusion Coatings PTI identified as Ohio EPA Air permit to Install number 01-06408.
- f. This facility shall utilize a Filter Cart VOC Truck Bay Door emission factor of  $4.766E-7$  lbs VOC/gal of product produced in the Large Batch Production Area for emissions units, P258-P261, P315-P325, and P377-P386, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted August 5<sup>th</sup>, 1998 for the Coil/Extrusion Coatings PTI identified as Ohio EPA Air permit to Install number 01-06408.
- g. This facility shall utilize a Filter Cart VOC Conc/Ox emission factor of  $1.7E-4$  lbs VOC/gal of product produced in the Large Batch Production Area for emissions units, P258-P261, P315-P325, and P377-P386, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted August 5<sup>th</sup>, 1998 for the Coil/Extrusion Coatings PTI identified as Ohio EPA Air permit to Install number 01-06408.
- h. This facility shall utilize a Filter Cart VOC Fugitive Stack emission factor of  $1.305E-5$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units, P258-P261, P315-P325, and P377-P386, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted August 5<sup>th</sup>, 1998 for the Coil/Extrusion Coatings PTI identified as Ohio EPA Air permit to Install number 01-06408.
- i. This facility shall utilize a Filter Cart VOC Truck Bay Door emission factor of  $5.328E-7$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units, P258-P261, P315-P325, and P377-P386, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted August 5<sup>th</sup>, 1998 for the Coil/Extrusion Coatings PTI identified as Ohio EPA Air permit to Install number 01-06408.
- j. This facility shall utilize a Filter Cart VOC Conc/Ox emission factor of  $1.032E-4$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units, P258-P261, P315-P325, and P377-P386, unless otherwise

approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted August 5<sup>th</sup>, 1998 for the Coil/Extrusion Coatings PTI identified as Ohio EPA Air permit to Install number 01-06408.

- k. The emissions from the Filter Carts, emissions units P258-P261, P315-P325, and P377-P386 shall not exceed the following:

VOC        0.78 tons/year

- l. Emissions of any individual Hazardous Air Pollutants (HAP) from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
- m. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
- n. Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The Filter Carts are portable. They can be used in two production areas (Large Batch Production Area and Small Batch Primary Portable Production Area); therefore, the production rates of the filter carts are equivalent to the production rates of the corresponding production areas. The maximum rolling 12-month coatings production rate for the Filter Carts, emissions units P258-P261, P315-P325, and P377-P386, shall be limited to 8,200,000 gallons. This limit is divided between the two production areas. Large Batch Production Area is limited to 7,500,000 gallons of coating per rolling, 12-months; and Small Batch Portable Production Area is limited to 700,000 gallons of coating per rolling, 12-months. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report). 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 production rate, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.
- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and

shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) The permittee shall maintain monthly records of the following information:
  - a. the production rate for each month; and
  - b. the rolling, 12-month summation of the production rates.
- (6) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- (7) This facility shall maintain daily records which list the following information for products filtered in the Filter Carts (emissions units P258-P261, P315-P325, and P377-P386):
  - a. the number of gallons of product filtered in each emissions unit;
  - b. the production area product filtered;
  - c. the total hours of daily operation of each emissions unit; and
  - d. total gallons filtered in each production area.

These records, as well as any supporting analyses and computations, shall be retained in the company's files for a period of not less than three (3) years and shall be made available to the Director or any authorized representative of the Director for review upon verbal or written request, during normal business hours.

- (8) The permittee shall collect and record the following information each month for all materials containing any HAP that are applied in the emissions unit:
- a. the name and identification number/code of each material containing any HAP;
  - b. the name/identification of each individual HAP contained in each material (and identified in d)(8)a. above) and the pound(s) of each HAP per gallon of each HAP-containing material;
  - c. the number of gallons of each material applied during the month;
  - d. for each individual HAP, the total uncontrolled emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(8)b. times d)(8)c. for all the materials during the month, divided by 2,000 pounds;
  - e. the total uncontrolled combined HAP emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAP emissions from d)(8)d. above;
  - f. for each individual HAP, the calculated, controlled emission rate from all the materials employed, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in d)(8)d. above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;
  - g. the calculated, controlled combined HAPs emission rate for all the materials employed, in ton(s), i.e., the uncontrolled total combined HAPs emission rate, calculated in d)(8)e. above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;
  - h. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(8)f. above, for the present month plus the previous 11 months of operation, in ton(s); and
  - i. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(8)g. above, for the present month plus the previous 11 months of operation, in ton(s).
- (9) This facility shall maintain monthly records which list the following information for products produced in the for the coil/extrusion coating portion of this facility:
- a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed (from d)(8) above);
  - b. calculations showing the rolling, 12-month total combined HAP emissions for all the materials employed (from d)(8) above); and

- c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
  - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
  - d. all exceedances of the rolling, 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
- (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - c. each incident of deviation described in d)(4)a. or d)(4)b. (above) where a prompt investigation was not conducted;

- d. each incident of deviation described in d)(4)a. or d)(4)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in d)(4)a. or d)(4)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (5) This facility shall submit quarterly reports to the CDO that provide the total VOC emissions for Filter Carts (emissions units P258-P261, P315-P325, and P377-P386), and which document any exceedance(s) of the permitted production rate and/or emissions limits, hourly and/or daily, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
- (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
  - b. all exceedances of the rolling, 12-month total combined HAP emission limitation for all the materials employed; and
  - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- 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 Limitations:  
The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.  
  
Applicable Compliance Method:  
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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
    - ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.

- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

- b. Emissions Limitation:

VOC emissions from the Filter Carts, emissions units P258-P261, P315-P325, and P377-386 shall not exceed 0.78 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(9) above).

c. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(9) above).

d. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(9) above).

e. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(9) above).

g) Miscellaneous Requirements

(1) None.



**19. Emissions Unit Group - Large Batch Premix Tanks: P201, P203, P204, P205, P206, P207, P208, P209, P210, & P211**

EU ID	Operations, Property and/or Equipment Description
P201	Large Batch 1,100 Gallon Premix Tank, PM-241
P203	Plastisol 1,200 Gallon Premix Tank, PM-211
P204	Large Batch 1,500 Gallon Premix Tank (Water Base), PM-221
P205	Large Batch 2,200 Gallon Premix Tank, PM-231
P206	Large Batch 1,100 Gallon Premix Tank, PM-251
P207	Large Batch 600 Gallon Premix Tank, PM-261
P208	Large Batch 600 Gallon Premix Tank, PM-271
P209	Large Batch 300 Gallon Premix Tank, PM-281
P210	Large Batch 300 Gallon Premix Tank, PM-291
P211	Large Batch 300 Gallon Premix Tank, PM-211

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)a., b)(2)e., b)(2)j. – b)(2)l., c(1), d)(7), e)(2)d., & e)(6)

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)	See b)(2)e. and b)(2)j. – b)(2)l
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control Volatile Organic Compounds (VOC) emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer (RTO) with a designed minimum control efficiency of 97.55%.  See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-17-11(B)(1)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The VOC emissions from this emissions unit shall be vented to the RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.
- e. The emissions from the Large Batch Production Area, Premix Tanks, (emissions units P201, and P203-P211) shall not exceed the following:

VOC from Premix Tanks	1.14 tons/year
Particulate Matter (PM) from Premix Tanks	0.57 tons/year

- f. This facility shall utilize a Premix Tank VOC Truck Bay Door emission factor of 5.128E-06 lbs VOC/gal of product produced in the Large Batch Production Area for emissions units, P201, and P203-P211 unless otherwise approved in writing by Ohio EPA, Central District Office (CDO). This emission factor was developed in accordance with the permit application submitted July 7, 2014.
  - g. This facility shall utilize a Premix Tank VOC Conc/Ox emission factor of 4.698E-05 lbs VOC/gal of product produced in the Large Batch Production Area for emissions units, P201, and P203-P211 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
  - h. This facility shall utilize a Premix Tank PM Large Batch Fugitive Stack emission factor of 4.93E-05 lbs PM/gal of product produced in the Large Batch Production Area for emissions units, P201, and P203-P211 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
  - i. This facility shall utilize a Premix Tank PM Truck Bay Door emission factor of 3.02E-6 lbs PM/gal of product produced in the Large Batch Production Area for emissions units, P201, and P203-P211 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
  - j. Emissions of any individual Hazardous Air Pollutants (HAP) from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
  - k. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
  - l. Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.
- c) **Operational Restrictions**
- (1) The maximum rolling, 12-month coatings production rate for the Large Batch Premix Tanks (emissions units P201 through P224 and P203-P211) shall be limited to 7,500,000 gallons. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report).
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.

- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- (6) This facility shall maintain monthly records which list the following information for products produced in the for the coil/extrusion coating portion of this facility:
  - a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed;
  - b. calculations showing the rolling, 12-month total combined HAP emissions for all the materials employed; and
  - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed.

- (7) This facility shall maintain daily records which list the following information for products produced in the Large Batch Production Area Premix Tanks (emissions units P201 and P203-P211):
- a. the number of gallons of product produced in the Large Batch Production Area;
  - b. the number of gallons of product produced in each emissions unit; and
  - c. the total hours of daily operation of each emissions unit.
- e) Reporting Requirements
- (1) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC emissions for the Large Batch Premix Tanks, emissions units P201 and P203-P211 which documents any exceedance(s) of the permitted production rate and/or emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
  - (2) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
    - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
    - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
    - d. all exceedances of the rolling, 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
  - (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 submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.

- (5) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
- (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
  - b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the materials employed; and
  - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- 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 Limitations:  
The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

b. Emissions Limitation:

VOC emissions from the Large Batch Production Area, Premix Tanks, (emissions units P201 and P203-P211) shall not exceed 1.14 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

c. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

d. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

e. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

f. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g. Emission Limitation:

The particulate emissions from the Large Batch Production Area, Premix Tanks, (emissions units P201 and P203-P211) shall not exceed 0.57 tons/year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(7) above).

g) Miscellaneous Requirements

- (1) None.

**20. Emissions Unit Group - Large Batch Thindown Tanks: P202, P212, P213, P214, P215, P216, P217, P218, P219, P220, P221, P222, P223, P224, P226, P227, P228, P229, P230, P231, P232, P233, P234, P235, P236, P237, P238, P239, P240, P241, P242, P243, P244, P245, P246, P247, P248, P249, P250, P251, P252, P253, P254, P255, P346, P347, P375, P376, & P396**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P202	Large Batch 2,000 Gallon Thindown Tank, TD242
P212	Large Batch 500 Gallon Thindown Tank (Water Base), TD-212
P213	Large Batch 500 Gallon Thindown Tank (Water Base), TD-213
P214	Large Batch 500 Gallon Thindown Tank (Water Base), TD-214
P215	Large Batch 500 Gallon Thindown Tank (Water Base), TD-215
P216	Large Batch 4,000 Gallon Thindown Tank (Water Base), TD-222
P217	Large Batch 6,000 Gallon Thindown Tank (Water Base), TD-223
P218	Large Batch 4,000 Gallon Thindown Tank w/ 60HP Agitator, TD-224
P219	Large Batch 4,000 Gallon Thindown Tank, TD-232
P220	Large Batch 6,000 Gallon Thindown Tank, TD-233
P221	Large Batch 6,000 Gallon Thindown Tank, TD-234
P222	Large Batch 500 Gallon Thindown Tank (Clears), TD-267
P223	Large Batch 2,000 Gallon Thindown Tank, TD-243
P224	Large Batch 2,000 Gallon Thindown Tank w/ 40 HP Agitator, TD-244
P226	Large Batch 2,000 Gallon Thindown Tank, TD-252
P227	Large Batch 2,000 Gallon Thindown Tank, TD-253
P228	Large Batch 2,000 Gallon Thindown Tank, TD-254
P229	Large Batch 2,000 Gallon Thindown Tank, TD-255
P230	Large Batch 1,000 Gallon Thindown Tank, TD-262
P231	Large Batch 1,000 Gallon Thindown Tank, TD-263
P232	Large Batch 1,000 Gallon Thindown Tank, TD-264
P233	Large Batch 1,000 Gallon Thindown Tank, TD-265
P234	Large Batch 1,000 Gallon Thindown Tank, TD-266
P235	Large Batch 1,000 Gallon Thindown Tank, TD-272
P236	Large Batch 1,000 Gallon Thindown Tank, TD-273
P237	Large Batch 1,000 Gallon Thindown Tank, TD-274
P238	Large Batch 1,000 Gallon Thindown Tank, TD-275
P239	Large Batch 1,000 Gallon Thindown Tank, TD-276
P240	Large Batch 500 Gallon Thindown Tank, TD-282
P241	Large Batch 500 Gallon Thindown Tank, TD-283
P242	Large Batch 500 Gallon Thindown Tank, TD-284
P243	Large Batch 500 Gallon Thindown Tank, TD-285
P244	Large Batch 500 Gallon Thindown Tank, TD-286
P245	Large Batch 500 Gallon Thindown Tank, TD-292
P246	Large Batch 500 Gallon Thindown Tank, TD-293
P247	Large Batch 500 Gallon Thindown Tank, TD-294
P248	Large Batch 500 Gallon Thindown Tank, TD-295
P249	Large Batch 500 Gallon Thindown Tank, TD-296
P250	Large Batch 500 Gallon Thindown Tank, TD-297
P251	Large Batch 500 Gallon Thindown Tank, TD-302
P252	Large Batch 500 Gallon Thindown Tank, TD-303

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P253	Large Batch 500 Gallon Thindown Tank, TD-304
P254	Large Batch 500 Gallon Thindown Tank, TD-305
P255	Large Batch 500 Gallon Thindown Tank, TD-306
P346	500 Gallon Thindown Tank w/ 25 HP Agitator, TD-287
P347	6,000 Gallon Thindown Tank w/ 75 HP Agitator TD-232
P375	Large Batch 3,000 Gallon Thindown Tank, TD-213
P376	Large Batch 3,000 Gallon Thindown Tank, TD-214
P396	Large Batch 1,000 Gallon Thindown Tank, TD-267

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)a., b)(2)e., b)(2)j. – b)(2)l., c(1), d)(6) ,d)(7), e)(2)d., & e)(6).

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)	See b)(2)e., and b)(2)j. – b)(2)l
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a designed minimum control efficiency of 97.55%. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-17-11(B)(1)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).



emission factor was developed in accordance with the permit application submitted July 7, 2014.

- g. This facility shall utilize a Thindown Tank PM Truck Bay Door emission factor of  $9.02E-8$  lbs PM/gal of product produced in the Large Batch Production Area for emission units P202, P212-P224, P226-P255, P346, P347, P375, P376, and P396, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- h. This facility shall utilize a Thindown Tank VOC Large Batch Fugitive Stack emission factor of  $1.364E-5$  lbs VOC/gal of product produced in the Large Batch Production Area for emissions units, P202, P212-P224-P226, P255, P346, P347, P375, P376, and P396, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- i. This facility shall utilize a Thindown Tank VOC Conc/Ox emission factor of  $1.047E-4$  lbs OC/gal of product produced in the Large Batch Production Area for emissions units, P202, P212-P224, P226-P255, P346, P347, P375, P376, and P396, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- j. Emissions of any individual Hazardous Air Pollutant (HAP) from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
- k. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
- l. Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The maximum rolling 12-month coatings production rate for the Large Batch Production Area Thindown Tanks (emissions units P202, P212-P224, P226-P255, P346, P347, P375, P376 and P396) shall be limited to 7,500,000 gallons. The production emissions will be assigned to the day the coating is drained from the letdown tank (corresponds to filling report).

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.
- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- (6) This facility shall maintain monthly records which list the following information for products produced in the for the coil/extrusion coating portion of this facility:
  - a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed;
  - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed; and

- c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed.
- (7) This facility shall maintain daily records which list the following information for products produced in the Large Batch Production Area Thindown Tanks (emissions units P202, P212-P224, P226-P255, P346, P347, P375, P376, and P396):
- a. the number of gallons of product produced in the Large Batch Production Area;
  - b. the number of gallons of product produced in each emissions unit; and
  - c. the total hours of daily operation of each emissions unit.
- e) Reporting Requirements
- (1) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC emissions for the Large Batch Thindown Tanks, emissions units P202, P212-P224, P226-P255, P346, P347, P375, P376, and P396, which documents any exceedance(s) of the permitted production rate and/or emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
- (2) The permittee shall submit quarterly summaries of the following records:
- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
  - c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
  - d. all exceedances of the rolling, 12-month limitation of the production rate.
- These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
  - (5) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
    - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
    - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
    - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.
  - (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
    - a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
    - b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the materials employed; and
    - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- 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 Limitations:



**Final Permit-to-Install and Operate**  
AKZO NOBEL COATINGS, INC.  
**Permit Number:** P0119131  
**Facility ID:** 0125040064  
**Effective Date:** 2/17/2016

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.



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

b. Emissions Limitation:

VOC emissions from the Large Batch Production Area, Thindown Tanks, (emissions units P202, P212-P224, P226-P255, P346, P347, P375, P376 and P396) shall not exceed 0.55 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

c. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

d. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

e. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

f. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g. Emission Limitation:

The particulate emissions from the Large Batch Production Area, Thindown Tanks, (emissions units P202, P212-P224, P226-P255, P346, P347, P375, P376, and P396) shall not exceed from 0.02 tons/year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(7) above).

g) Miscellaneous Requirements

- (1) None.

**21. Emissions Unit Group - Small & Intermix Portable Tank: P275, P276, P277, P278, P279, P280, P281, P282, P283, P284, P285, P286, P287, P288, P289, P290, P291, P305, P306, P307, P308, P326, P327, P328, P329, P330, P331, P332, P333, P334, P335, P371, P387, P388, P389, P390, P391, P392, P393, P394, & P395**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P275	Small Batch Portable Mixing Station, AG-701
P276	Small Batch Portable Mixing Station, AG-702
P277	Small Batch Portable Mixing Station, AG-703
P278	Small Batch Portable Mixing Station, AG-704
P279	Small Batch Portable Mixing Station, AG-705
P280	Small Batch Portable Mixing Station, AG-706
P281	Small Batch Portable Mixing Station, AG-707
P282	Small Batch Portable Mixing Station, AG-708
P283	Small Batch Portable Mixing Station, AG-709
P284	Small Batch Portable Mixing Station, AG-710
P285	Small Batch Portable Mixing Station, AG-711
P286	Small Batch Portable Mixing Station, AG-712
P287	Small Batch Portable Mixing Station, AG-713
P288	Small Batch Portable Mixing Station, AG-714
P289	Small Batch Portable Mixing Station, AG-715
P290	Small Batch Portable Mixing Station, AG-716
P291	Small Batch Portable Mixing Station, AG-717
P305	Small Batch Portable Mixing Station, AG-731
P306	Small Batch Portable Mixing Station, AG-732
P307	Small Batch Portable Mixing Station, AG-733
P308	Small Batch Portable Mixing Station, AG-734
P326	Micro Batch Mixing Station, AG-781
P327	Micro Batch Mixing Station, AG-782
P328	Micro Batch Mixing Station, AG-783
P329	Micro Batch Mixing Station, AG-784
P330	Micro Batch Mixing Station, AG-785
P331	Micro Batch Mixing Station, AG-786
P332	Micro Batch Mixing Station, AG-787
P333	Micro Batch Mixing Station, AG-788
P334	Micro Batch Mixing Station, AG-789
P335	Micro Batch Mixing Station, AG-790
P371	Portable Small Batch and Intermix Agitator.
P387	Small Batch Portable Mixing Station
P388	Small Batch Portable Mixing Station
P389	Small Batch Portable Mixing Station
P390	Small Batch Portable Mixing Station
P391	Small Batch Portable Mixing Station
P392	Micro Batch Mixing Station
P393	Micro Batch Mixing Station
P394	Micro Batch Mixing Station
P395	Micro Batch Mixing Station

- 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)a., b)(2)n. – b)(2)q., c(1), c)(2), d)(6), d)(7), e)(1)d., & e)(5)
- 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)	See b)(2)n. – b)(2)q.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control Volatile Organic Compounds (VOC) emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer (RTO) with a designed minimum control efficiency of 97.55%.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-17-11(B)(1)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The VOC emissions from this emissions unit shall be vented to the RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.
- e. This facility shall utilize a Mixing Station VOC Small Batch Primary Portable Fugitive Stack emission factor of  $3.589E-3$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units, P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, Central District Office (CDO). This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- f. This facility shall utilize a Mixing Station VOC Small Batch Primary Portable Truck Bay Door emission factor of  $1.465E-4$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units, P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- g. This facility shall utilize a Mixing Station VOC Small Batch Primary Portable Conc/Ox emission factor of  $1.73E-2$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.

- h. This facility shall utilize a Mixing Station VOC Small Batch Intermix Portable Fugitive Stack emission factor of  $1.778E-4$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units, P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- i. This facility shall utilize a Mixing Station VOC Small Batch Intermix Portable Truck Bay Door emission factor of  $7.258E-6$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units, P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- j. This facility shall utilize a Mixing Station VOC Small Batch Intermix Portable Conc/Ox emission factor of  $3.219E-4$  lbs VOC/gal of product produced in the Small Batch Portable Production Area for emissions units, P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- k. This facility shall utilize a Mixing Station Particulate Matter (PM) Small Batch Primary Portable Conc/Ox emission factor of  $2.2E-5$  lbs PM/gal of product produced in the Small Batch Portable Production Area for emissions units P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- l. This facility shall utilize a Mixing Station PM Small Batch Primary Portable Truck Bay Door emission factor of  $5.09E-6$  lbs PM/gal of product produced in the Small Batch Portable Production Area for emissions units, P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- m. This facility shall utilize a Mixing Station PM Small Batch Primary Portable fugitive stack emission factor of  $1.25E-4$  lbs PM/gal of product produced in the Small Batch Portable Production Area for emissions units, P275-P291, P305-P308, P326-P335, P371, and P387-P395, unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- n. The emissions from the Small Batch Portable Production Area, (emissions units P275 through P291, P305 through P308, P326 through P335, P371, and P387 through P395) shall not exceed the following:

VOC      9.06 tons/year

PM      0.1 tons/year



measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
  - (6) This facility shall maintain monthly records which list the following information for products produced in the portion of this facility: for the coil/extrusion coating
    - a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed;
    - b. calculations showing the rolling, 12-month total combined HAP emissions for all the materials employed;
    - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed; and
    - d. calculations showing the total PM emissions for all the materials employed.
  - (7) This facility shall maintain daily records which list the following information for products produced in the Small Batch Portable Production Area (emissions units P275-P291, P305-P308, P326-P335, P371, and P387-P395):
    - a. the number of gallons of product produced in the Small Batch Primary Portable Production Area;
    - b. the number of gallons of product produced in the Small Batch Intermix Portable Production Area;
    - c. the number of gallons of product produced in each emissions unit; and
    - d. the total hours of daily operation of each emissions unit;
- e) Reporting Requirements
- (1) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than

50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

- b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
- c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
- d. all exceedances of the rolling, 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
- (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
  - b. all exceedances of the rolling, 12-month total combined HAP emission limitation for all the materials employed; and
  - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.
- (6) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC and PM emissions from the Small Batch Portable Production Area, (emissions units P275-P291, P305-P308, P326-P335, P371, and P387-P395), and which documents any exceedance(s) of the permitted emissions limits, for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively).

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

- b. Emissions Limitation:

VOC emissions from the Small Batch Portable Production Area, (emissions units P275-P291, P305-P308, P326-P335, P371, and P387-P395) shall not exceed 9.06 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

c. Emission Limitation:

The particulate emissions from the Small Batch Portable Production Area, (emissions units P275-P291, P305-P308, P326-P335, P371, and P387-P395) shall not exceed 0.10 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

d. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

e. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

f. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling 12-month summation of total HAP emissions produced, in tons per rolling 12-month period, (as derived from the records required by term and condition d)(6) above).



g. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

h. Emission Limitation:

The particulate emissions from the Small Batch Production Area, Portable Tank Mixing, (emissions units P275-P291, P305-P308, P326-P335, P371, and P387-P395) shall not exceed from 0.10 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

g) Miscellaneous Requirements

- (1) None.

**22. Emissions Unit Group - Strontium Chromate: P256 & P257**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P256	600 Gallon Strontium Slurry Premix Tank, PM-751
P257	1,500 Gallon Strontium Slurry Premix Tank, PM-761

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)a., b)(2)h. – b)(2)k., c(1), d)(6), d)(7), e)(2)d. & e)(6)

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)	See b)(2)h. – b)(2)k.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The permittee shall control Volatile Organic Compounds (VOC) emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer (RTO) with a designed minimum control efficiency of 97.55%.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-17-11(B)(1)	The emission limit specified by this rule is equivalent to or less stringent than the emission limit established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a six (6)-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State implementation Plan.

- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.
- c. The VOC emissions from this emissions unit shall be vented to the RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- d. The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.
- e. This facility shall utilize a Strontium Chromate Slurry System VOC Fugitive Stack emission factor of 5.17E-6 lbs VOC/gal of Strontium Chromate Slurry produced in emissions units P256 and P257 unless otherwise approved in writing by Ohio EPA, Central District Office (CDO). This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- f. This facility shall utilize a Strontium Chromate Slurry System Conc/Ox emission factor of 1.25E-5 lbs VOC/gal of Strontium Chromate Slurry produced in emissions units P256 and P257 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.
- g. This facility shall utilize a Strontium Chromate Slurry System Particulate Matter (PM) Fugitive Stack emission factor of 1.13E-8 lbs PM/gal of Strontium Chromate Slurry produced in emissions units P256 and P257 unless otherwise approved in writing by Ohio EPA, CDO. This emission factor was developed in accordance with the permit application submitted July 7, 2014.

- h. The emissions for the strontium chromate system (P256 and P257) shall not exceed the following:
  - VOC 3.60E-3 tons/year
  - PM 2.29E-6 tons/year
- i. Emissions of any individual Hazardous Air Pollutants (HAP) from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.
- j. Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.
- k. Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month coatings production rate for the Strontium Chromate Slurry System, (emissions units P256 and P257) shall be limited to 404,920 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO 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.
- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was 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; and

- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (3) Whenever the monitored average combustion temperature within the RTO deviates from the 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.

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. 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) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
  - (6) This facility shall maintain monthly records which list the following information for products produced in the portion of this facility: 

for the coil/extrusion coating

    - a. calculations showing the rolling, 12-month individual HAP emissions for each HAP for all the materials employed;
    - b. calculations showing the rolling, 12-month total combined HAPs emissions for all the materials employed;
    - c. calculations showing the rolling, 12-month total VOC emissions for all the materials employed; and
    - d. calculations showing the rolling, 12-month total PM emissions for all the materials employed.
  - (7) This facility shall maintain daily records which list the following information for products produced in the Strontium Chromate Slurry System, emissions units P256 and P257.
    - a. the number of gallons of product produced in the Strontium Chromate Slurry System Area; and
    - b. the total hours of daily operation of each emissions unit.
- e) Reporting Requirements
- (1) This facility shall submit quarterly reports to Ohio EPA, Central District Office, which provide the total VOC and PM emissions for this emissions unit and which documents any exceedance(s) of the permitted production rate and/or emissions limits, , for the previous three (3) calendar months (October 1 through December 31, January 1 through March 31, April 1 through June 30, and July 1 through September 30, respectively). The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year.
  - (2) The permittee shall submit quarterly summaries of the following records:
    - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than

50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

- b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
- c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s); and
- d. all exceedances of the rolling, 12-month limitation of the production rate.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA. The PER must be completed electronically and submitted via Ohio EPA e-Business 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.
- (5) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the RTO during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - 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(s) into compliance and/or the temperature within the RTO 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), as identified in the monitoring and record keeping requirements of this permit.

- (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the materials employed;
  - b. all exceedances of the rolling, 12-month total combined HAP emission limitation for all the materials employed; and
  - c. all exceedances of the rolling, 12-month total VOC emission limitation for all the materials employed.

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 Limitations:

The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 97.55%.

Applicable Compliance Method:

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 within 6 months after issuance of this permit and within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate compliance with the minimum VOC control efficiency of 97.55%.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA, Central District Office. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iv. The test(s) shall be conducted while the facility is operating at or near its maximum capacity unless otherwise specified or approved by Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), 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.

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

- b. Emissions Limitation:

VOC emissions for the strontium chromate system (P256 and P257) shall not exceed  $3.6E-3$  tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

- c. Emission Limitation:

Emissions of any individual HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 6.14 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of individual HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).



d. Emission Limitation:

Emissions of VOC from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 19.54 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of VOC emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

e. Emission Limitation:

Emissions of total HAP from all emission units located at this facility included as part of the coil/extrusion coating operation shall not exceed 10.41 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation shall be determined by the actual rolling, 12-month summation of total HAP emissions produced, in tons per rolling, 12-month period, (as derived from the records required by term and condition d)(6) above).

f. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g. Emission Limitation:

The particulate emissions for the strontium chromate system (P256 and P257) shall not exceed 2.28E-6 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by the actual rolling, 12-month summation of particulate emissions produced, in tons per year, (as derived from the records required by term and condition d)(6) above).

g) Miscellaneous Requirements

(1) None.