



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

3/16/2016

Certified Mail

Mr. Jeffrey Neville
Americas Styrenics, LLC
17401 State Route 7 South
Marietta, OH 45750

Facility ID: 0684020001
Permit Number: P0091070
County: Washington

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Marietta Times. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-SEDO; Pennsylvania; West Virginia

PUBLIC NOTICE

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

Draft Title V Permit Renewal

Americas Styrenics, LLC

17401 State Route Seven South, 17401 State Route Seven South, Marietta, OH 45750

ID#: P0091070

Date of Action: 3/16/2016

PermitDesc: Renewal Title V operating permit for a polystyrene plastic manufacturer..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the ID # or: Kimbra Reinbold, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



Statement of Basis
 Americas Styrenics, LLC
 Permit Number: P0091070
 Facility ID: 0684020001

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0684020001
Facility Name:	Americas Styrenics, LLC
Facility Description:	Polystyrene Plastic Manufacturer
Facility Address:	17401 State Route Seven South, Marietta, OH 45750
Permit #:	P0091070, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Statement of Basis
 Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	P007,P014-P016 (insignificant) – incorporated 40 CFR Part 63 Subpart ZZZZ. P001 (significant)- removed operational restriction [i.e. the burning of ng, #2, styrene distillate, and/or styrenic tars in hot oil heaters...] that was not first established in a PTI and the corresponding monitoring & reporting terms; incorporated the terms of 40 CFR Part 63 Subpart H. P002 (significant) – removed operational restriction [i.e. sulfur content restriction] that was not first established in a PTI and the corresponding monitoring & reporting terms; added term to explain why 40 CFR Part 63 Subpart ZZZZ is not applicable; incorporated the terms of 40 CFR Part 63 Subpart H.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	None.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1	77-07(A)(13)		List facility-wide state-only enforceable terms and conditions.
B.2	77-07(A)(13)		List insignificant emissions unit subject to one or more applicable requirements.
B.3	77-07(A)(13)		List the applicable sections of 40 CFR Part 63 Subpart ZZZZ

C. Emissions Unit Terms and Conditions

<p>Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements? R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement Misc = miscellaneous requirements</p>													
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										



Statement of Basis
Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001

P001	VOCpt: 1.12lbs/hr, 9.1 py	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	VOCfug: 0.94lb/hr, 4.1 py	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	Styrene: 0.20lbs/hr, 9.7 py	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	Toluene: 0.49lb/hr, 2.1 py	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	Cumene: 0.18lb/hr, 0.8 py	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	Ethylbenzene 0.002lb/hr, 0.01 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	Xylene: 0.03lb/hr, 0.11 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	PE: 8.89lbs/hr, 8.9 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	NOx: 7.80lbs/hr, 4.2 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	CO: 1.02lbs/hr, 0.5 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001	SO2: 3.37lbs/hr, 4.8 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001, P002, P003, P004	20% opacity	17-07(A)	N	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.



Statement of Basis
 Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001

P001, P003	*MACT limit	N	40 CFR Part 63, Subpart JJJ	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P001, P003	None	21-09(DD)	N	Y	N	N	N	N	N	N	N	N	ND=The requirements specified by this applicable rule are equivalent to or less stringent than the requirements specified by 40 CFR Part 63, Subpart JJJ.
P001, P003, P004	None	17-11(B)(1)	N	Y	N	N	N	N	N	N	N	N	ND=The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P001, P003	None	21-09(CC)	N	Y	N	N	N	N	N	N	N	N	ND=The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P003	VOCpt: 0.20lb/hr, 0.9 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	VOCfug: 3.61lbs/hr, 5.8 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	Styrene: 2.09lbs/hr, 2.2 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	Toluene: 1.45lbs/hr, 1.4 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	Cumene: 0.13lb/hr, 0.6 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	Ethylbenzene: 0.008lb/hr, 0.033 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	Xylene: 0.10lb/hr, 0.43 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	PE: 2.66lbs/hr, 1.6 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.



Statement of Basis
 Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001

P003	NOx: 2.40lbs/hr, 0.5 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	CO: 0.37lb/hr, 1.6 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P003	SO2: 1.54lbs/hr, 0.8 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
P002	PE: 0.63lb/hr	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance. OR: 624 hours/yr
P002	SO2: 3.0lbs/hr	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance. OR: 624 hours/yr
P002	NOx: 70lbs/hr	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance. OR: 624 hours/yr
P002	CO: 7.6lbs/hr	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance. OR: 624 hours/yr
P002	None	17-11(B)(5)(a)	N	Y	N	N	N	N	N	N	N	N	ND= The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to DAC rule 3745-31-05(A)(3).
P002	None	18-06(G)	N	Y	N	N	N	N	N	N	N	N	ND= The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to DAC rule 3745-31-05(A)(3).
P004	PE: 4.18lbs/hr, 8.3 tpy	N	31-05(A)(3)	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance.
T001, T002, T013, T014	None	21-07(M)	N	Y	N	N	N	N	N	N	N	N	ND=Emission units are not subject to the requirements of the rule because they do not meet all conditions outlined in OAC rule 3745-21-07(M)(3)(a).
T001, T002, T013,	None	N	40 CFR Part 63, Subpart JJJ	Y	N	N	N	N	N	N	N	N	ND=The provisions do not apply to storage vessels containing styrene at existing affected sources.



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Americas Styrenics, LLC**

Facility ID:	0684020001
Permit Number:	P0091070
Permit Type:	Renewal
Issued:	3/16/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Americas Styrenics, LLC

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	10
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies	12
17. Off-Permit Changes	12
18. Compliance Method Requirements	13
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	14
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	15
26. Inspections and Information Requests	15
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	16
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	19
1. P001, Process Lines 6-13	20
2. P002, Emergency Diesel Generator.....	31
3. P003, Process Line 14	36
4. P004, Product Handling	48
5. Emissions Unit Group -Tanks: T001,T002,T013,T014,.....	51



Draft Title V Permit
Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0684020001
Facility Description: Polystyrene Plastic Manufacturer
Application Number(s): A0022418
Permit Number: P0091070
Permit Description: Renewal Title V operating permit for a polystyrene plastic manufacturer.
Permit Type: Renewal
Issue Date: 3/16/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0091068

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Americas Styrenics, LLC
17401 State Route Seven South
17401 State Route Seven South
Marietta, OH 45750

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Southeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Southeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Southeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

- (2) Compliance certifications shall include the following:
- a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to

respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.



Unless otherwise exempted, noemissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Southeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit
Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, 3745-31, and/or 40 CFR Part 60 or 63:
 - a) G001 - Gasoline and Diesel Fuel Dispensing (PTI 06-3439)
 - b) P007 – Emergency Generator (PBR02941)
 - c) P014 – Emergency Generator (PBR02948)
 - d) P015 - Emergency Generator (PBR02949)
 - e) P016 – Emergency Generator (PBR02950)
 - f) P018 – 80 HP Sull Air Compressor (PBR05751)
 - g) P020 – 45.5 kW Air Compressor (PBR07995)
 - h) P021 – 600 kW Air Compressor Diesel Generator (PBR08339)
 - i) P022 – 45.5 kW Diesel Air Compressor (PBR08340)
 - j) P926 – 75 HP Distillate Oil Air Compressor (PBR07267)

[Authority for term: OAC rule 3745-77-07(A)(13)]

3. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: P007, P014, P015, P016. The complete NESHAPS requirements, including the NESHAPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Ohio EPA, Northwest District Office.

These emissions units are existing emergency compression ignition (CI) reciprocating internal combustion engine(s) (RICE), installed before 06/12/06, located at an area source for hazardous air pollutants (HAPs) and are subject to the following:

General Compliance Requirements	63.6603, 63.6605. 63.6640(f) and Table 2d
Monitoring, Installation, Collection, Operation and Maintenance Requirements	63.6625(e), (f), (h) and (i)
Reporting Requirements	63.6640(b), 63.6650(f)
Record Keeping Requirements	63.6655(e) and (f), 63.6660(a), (b), (c) and Table 6
General Provisions	63.6665 and Table 8
Implementation and Enforcement	63.6670

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart ZZZZ]



Draft Title V Permit
Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



Effective Date: To be entered upon final issuance

1. P001, Process Lines 6-13

Operations, Property and/or Equipment Description:

Process Lines 6-13

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

(1) 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) [PTI 06-04863, issued 6/10/03]	<p>Total point source volatile organic compound (VOC) emissions shall not exceed 2.12 lbs/hr and 9.1 tons/yr.</p> <p>Total fugitive VOC emissions shall not exceed 0.94 lb/hr and 4.1 tons/yr.</p> <p>The following individual toxic pollutant limitations are included in the VOC emissions limitations above:</p> <p>styrene emissions (point source and fugitive) shall not exceed 2.20 lbs/hr and 9.7 tons/yr;</p> <p>toluene emissions (point source and fugitive) shall not exceed 0.49 lb/hr and 2.1 tons/yr;</p> <p>cumene emissions (point source and fugitive) shall not exceed 0.18 lb/hr and 0.8 ton/yr;</p> <p>ethyl benzene emissions (fugitive) shall not exceed 0.002 lb/hr and 0.01 ton/yr; and</p> <p>Xylene emissions (fugitive) shall not exceed 0.03 lb/hr and 0.11 ton/yr.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Total particulate emissions (PE) shall not exceed 8.89 lbs/hr and 38.9 tons/yr.</p> <p>Total nitrogen oxides (NOx) emissions shall not exceed 7.80 lbs/hr and 34.2 tons/yr.</p> <p>Total carbon monoxide (CO) emissions shall not exceed 1.02 lbs/hr and 4.5 tons/yr.</p> <p>Total sulfur dioxide (SO2) emissions shall not exceed 3.37 lbs/hr and 14.8 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-09(DD).</p>
b.	OAC rule 3745-17-07(A)	Visible PE from the hot oil heater exhaust stacks shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-21-09(DD)	See b)(2)b.
d.	40 CFR Part 63, Subpart JJJ [40 CFR 63.1313 et seq.]	The permittee shall reduce the HAP or TOC emissions from all process vents, as defined in 40 CFR 63.1312, in a combustion device to achieve 98 weight percent reduction or to achieve a concentration of 20 parts per million by volume (ppmv) on a dry basis, whichever is less stringent. If the permittee elects to comply with the 20 ppmv standard, the concentration shall include a correction to 3 percent oxygen only when supplemental combustion air is used to combust the emissions. Compliance may be based on either organic HAP or TOC.
e.	40 CFR Part 63, Subpart A [40 CFR 63.1 et seq.]	Table 1 to 40 CFR, Part 63, Subpart H-Applicability of General Provisions to Subpart JJJ shows which parts of the General Provisions apply.
f.	OAC rule 3745-17-11(B)(1)	See b)(2)a.
g.	OAC rule 3745-21-09(CC)	See b)(2)a.
h.	40 CFR Part 63, Subpart A [40 CFR 63.1 et seq.]	Table 4 to 40 CFR, Part 63, Subpart H-Applicability of General Provisions to



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Subpart H shows which parts of the General Provisions apply.
i.	40 CFR Part 63, Subpart H [40 CFR 63.160 et seq.]	The permittee shall comply with the equipment leak detection requirements in 40 CFR Part 63, Subpart H.

(2) Additional Terms and Conditions

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. The requirements specified by this applicable rule are equivalent to or less stringent than the requirements specified by 40 CFR Part 63, Subpart JJJ.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the amount of polystyrene produced, in tons;
- b. the total hours of polystyrene production; and
- c. the average hourly polystyrene production rate for the month, in tons/hr [i.e., d)(1)a./d)(1)b.].

(Note: Polystyrene production hours include any time when one or more production line(s) associated with this emissions unit is (are) in operation.)

[OAC rule 3745-77-07(C)(1)]

(2) Each calendar year, the permittee shall collect and record the annual polystyrene production rate, in tons per year, for this emissions unit.

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the hot oil heater exhaust stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;



- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall comply with the applicable monitoring and record keeping required under 40 CFR Part 63, Subpart JJJ, including the following sections:

63.1317 and 63.1319(a)	If using a control device, comply with the applicable monitoring and record keeping provisions in 63.1315(a), except that references to group determinations (i.e., total resource effectiveness) do not apply and owners or operators are not required to comply with 63.113.
63.1315(a)	Comply with the requirements of 63.113 through 63.118
63.114	Monitoring requirements
63.117 and 63.118	Record keeping requirements
63.1331	Equipment leak provisions
63.1335	General record keeping provisions

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJ]

- (5) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart H, including the following sections:



Effective Date: To be entered upon final issuance

63.163(a)	Light liquid service pump provisions
63.168(a)	Valves in light liquid service provisions
63.173(a)(1)	Monthly monitoring provisions for agitators in light liquid service
63.174(a)	Monitoring provisions for all connectors in light liquid service
63.175	Quality improvement program for valves
63.176	Quality improvement program for pumps
63.180(b), (d)	Monitoring requirements, determining percent organic HAP content
63.181(a),(b),(c),(d), (h)(1) through (h)(9)	Provisions for one recordkeeping system, equipment information, documentation of inspection retention, documentation of leak detection, and additional record keeping

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart H]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the hot oil heater exhaust stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the applicable reporting required under 40 CFR Part 63, Subpart JJJ, including the following sections:

63.1320(a)	If using a control device, comply with the applicable reporting provisions in 63.1315(a), except that references to group determinations (i.e., total resource effectiveness) do not apply and owners or operators are not required to comply with 63.113.
63.1315(a)	Comply with the requirements of 63.113 through 63.118



63.117 and 63.118	Reporting requirements
63.1331	Equipment leak provisions
63.1335	General reporting provisions

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJ]

- (3) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA Southeast District Office as are required pursuant to 40 CFR Part 63, Subpart H, per the following sections:

63.182(a) - (d)	Initial Notification, notification of compliance status, notification inclusions, and periodic reports
-----------------	--

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart H]

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:

Total point source VOC emissions shall not exceed 2.12 lbs/hr and 9.1 tpy.

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (tons/hr) in d)(1)c. by the permittee-supplied VOC emission factor of 0.06057 pound per ton of product. The emission factor shall be updated whenever additional testing is performed.

If required, the permittee shall demonstrate compliance with the lbs/hr emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(2) by the permittee-supplied VOC emission factor of 0.06057 pound per ton of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

Total fugitive VOC emissions shall not exceed 0.94 lb/hr and 4.1 tpy.

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (tons/hr) in d)(1)c. by the permittee-supplied VOC emission factor of 0.02685 pound per ton of product (Chevron Air Emission Inventory Report, Radian Corporation 1995).

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(2) by the permittee-supplied VOC emission factor of 0.02685 pound per ton of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

Styrene emissions (point source and fugitive) shall not exceed 2.20 lbs/hr and 9.7 tpy.

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (tons/hr) in d)(1)c. by the permittee-supplied styrene emission factor of 0.06285 pound per ton of product (Chevron Air Emission Inventory Report, Radian Corporation 1995).

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(2) by the permittee-supplied styrene emission factor of 0.06285 pound per ton of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

Toluene emissions (point source and fugitive) shall not exceed 0.49 lb/hr and 2.1 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (tons/hr) in d)(1)c. by the permittee-supplied toluene emission factor of 0.014 pound per ton of product (Chevron Air Emission Inventory Report, Radian Corporation 1995).



Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(2) by the permittee-supplied toluene emission factor of 0.014 pound per ton of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

Cumene emissions (point source and fugitive) shall not exceed 0.18 lb/hr and 0.8 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (tons/hr) in d)(1)c. by the permittee-supplied cumene emission factor of 0.00514 pound per ton of product (Chevron Air Emission Inventory Report, Radian Corporation 1995).

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(2) by the permittee-supplied cumene emission factor of 0.00514 pound per ton of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

f. Emission Limitations:

Ethyl benzene emissions (fugitive) shall not exceed 0.002 lb/hr and 0.01 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (tons/hr) in d)(1)c. by the permittee-supplied ethyl benzene emission factor of 0.000057 pound per ton of product (Chevron Air Emission Inventory Report, Radian Corporation 1995).

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(2) by the permittee-supplied ethyl benzene emission factor of 0.000057 pound per ton of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

g. Emission Limitations:

Xylene emissions (fugitive) shall not exceed 0.03 lb/hr and 0.11 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (tons/hr) in d)(1)c. by the permittee-supplied xylene emission factor of 0.00085 pound per ton of product (Chevron Air Emission Inventory Report, Radian Corporation 1995).

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(1) by the permittee-supplied xylene emission factor of 0.00085 pound per ton of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

h. Emission Limitations:

Total PE shall not exceed 8.89 lbs/hr and 38.9 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(1)(c) by the permittee-supplied PM emission factor of 0.0005 pound per 1,000 pounds of. The emission factor shall be updated whenever additional testing is performed.

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(2) by the emissions unit-specific particulate emission factor, in pound of PE per ton of product, established during the most recent emission test, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

i. Emission Limitations:

NOx emissions shall not exceed 7.80 lbs/hr and 34.2 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(1)(c) by the emission unit specific NOx emission factor, in pound NOx per 1,000 pounds of product, established during the most recent emission tests. The emission factor shall be updated whenever additional testing is performed.

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".



Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(2) by the emissions unit specific NO_x emission factor, in pound NO_x per 1,000 pounds of product, established during the most recent emission tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

j. Emission Limitations:

CO emissions shall not exceed 1.02 lbs/hr and 4.5 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(1)(c) by the emissions unit-specific CO emission factor, in pound of CO per 1,000 pounds of product, established during the most recent emission. The emission factor shall be updated whenever additional testing is performed.

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation above in accordance with Methods 1 – 4 and 10 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(2) by the emissions unit-specific CO emission factor, in pound of CO per 1,000 pounds of product, established during the most recent emission tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

k. Emission Limitations:

SO₂ emissions shall not exceed 3.37 lbs/hr and 14.8 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(1)(c)) by the emissions unit-specific SO₂ emission factor, in pound of SO₂ per 1,000 pounds of product, established during the most recent emission. The emission factor shall be updated whenever additional testing is performed.

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation above in accordance with Methods 1 – 4 and 6 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(2) by the emissions unit-specific SO₂ emission factor, in pound of SO₂ per 1,000



pounds of product, established during the most recent emission tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1)]

I. Emission Limitation:

Visible PE from the hot oil heater exhaust stacks shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible PE 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).

[OAC rule 3745-77-07(C)(1)]

m. Emission Limitation:

The permittee shall reduce the HAP or TOC emissions from all process vents, as defined in 40 CFR 63.1312, in a combustion device to achieve 98 weight percent reduction or to achieve a concentration of 20 parts per million by volume (ppmv) on a dry basis, whichever is less stringent. If the permittee elects to comply with the 20 ppmv standard, the concentration shall include a correction to 3 percent oxygen only when supplemental combustion air is used to combust the emissions. Compliance may be based on either organic HAP or TOC.

Applicable Compliance Method:

PET and Polystyrene Affected Sources - Testing and Compliance Demonstration Provisions

Continuous process vents using a control or recovery device to comply with 63.1316 shall comply with the applicable testing and compliance provisions for continuous process vents specified in 63.1315(a) except that, for purposes of this paragraph (a), references to group determinations (i.e., total resource effectiveness) do not apply and owners or operators are not required to comply with 63.113.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJ]

g) Miscellaneous Requirements

(1) None.



2. P002, Emergency Diesel Generator

Operations, Property and/or Equipment Description:

2168 bhP emergency diesel generator

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

(1) 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) [PTI 06-4371, issued 7/30/02]	Particulate emissions (PE) shall not exceed 0.63 lb/hr. Sulfur dioxide emissions shall not exceed 3.0 lbs/hr. Nitrogen oxides emissions shall not exceed 70 lbs/hr. Carbon monoxide emissions shall not exceed 7.6 lbs/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A).
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(5)(a)	See b)(2)a.
d.	OAC rule 3745-18-06(G)	See b)(2)a.
e.	OAC rule 3745-31-05(D) [PTI 06-4371, issued 9/13/95]	See c)(1)
f.	40 CFR Part 63 Subpart ZZZZ (40 CFR 63.580 et seq.)	Exempt, see b)(2)b.

(2) Additional Terms and Conditions

- a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. This emissions unit does not need to meet the requirements of 40 CFR Part 63 Subpart ZZZZ and of subpart A of Part 63, including initial notification requirements per 63.6590(b)(3)(iii). This emissions unit is an existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 624 hours, based upon a rolling, 12-month summation of the operating hours.
[OAC rule 3745-77-07(A)(1) and PTI 06-4371]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following for this emissions unit:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the operating hours.[OAC rule 3745-77-07(C)(1) and PTI 06-4371]
- (2) For each day during which the permittee burns a fuel with a sulfur content that exceeds the above limitation, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
[OAC rule 3745-77-07(C)(1)]
- (3) For each shipment of fuel oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of fuel oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/hr). (The sulfur dioxide emission rate shall be calculated in accordance with f)(1)b.) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.
[OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

[OAC rule 3745-77-07(C)(1)]

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 06-4371, issued on July 30, 2002: d)(1) through d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month operating hours' restriction. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI 06-4371]

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:

PE shall not exceed 0.63 lb/hr.

Applicable Compliance Method:

Compliance may be demonstrated using the particulate emission factor of 0.63 lb/hr based on emission test results for a similar unit provided by the manufacturer.

If required, compliance with the hourly PE limitation shall be demonstrated based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1) and PTI 06-4371]



b. Emission Limitation:

SO₂ emissions shall not exceed 3.0 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly SO₂ emission limitation shall be demonstrated based upon the record keeping requirements specified in d). The lb/mmBtu sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)(2) as follows:

$$ER = (1 \times 10E6) / H \times D \times S \times 1.974$$

where:

ER = emission rate in pounds of sulfur dioxide per MMBtu;

H = the heat content of the fuel in Btu per gallon;

D = the density of the fuel in pounds per gallon; and

S = the decimal fraction of sulfur in the fuel.

The lbs/hr sulfur dioxide emission rate shall be calculated using the formula above and the maximum hourly heat input rate as follows:

$$ER(\text{lbs/hr}) = ER(\text{lb/mmBtu}) \times 13.5 \text{ mmBtu/hr}$$

If required, compliance with the hourly SO₂ emission limitation shall be demonstrated based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[OAC rule 3745-77-07(C)(1) and PTI 06-4371]

c. Emission Limitation:

NO_x emissions shall not exceed 70 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly NO_x emission limitation may be demonstrated using the nitrogen oxides emission factor of 70 lbs/hr based on emission test results for a similar unit provided by the manufacturer.

If required, compliance with the hourly NO_x emission limitation shall be demonstrated based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

[OAC rule 3745-77-07(C)(1) and PTI 06-4371]



d. Emission Limitation:

CO emissions shall not exceed 7.6 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly CO emission limitation may be demonstrated using the carbon monoxide emission factor of 7.5 lbs/hr based on emission test results for a similar unit provided by the manufacturer.

If required, compliance with the hourly CO emission limitation shall be demonstrated based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

[OAC rule 3745-77-07(C)(1) and PTI 06-4371]

e. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI 06-4371]

g) Miscellaneous Requirements

- (1) None.

3. P003, Process Line 14

Operations, Property and/or Equipment Description:

Process Line 14

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

(1) 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) [PTI P0103699, issued 10/7/08]	<p>Total point source volatile organic compound (VOC) emissions shall not exceed 0.20 lb/hr and 0.9 ton/yr.</p> <p>Total fugitive VOC emissions shall not exceed 3.61 lbs/hr and 15.8 tons/yr.</p> <p>The following individual toxic pollutant limitations are included in the VOC emissions limitations above:</p> <p>styrene emissions (point source and fugitive) shall not exceed 2.09 lbs/hr and 9.2 tons/yr;</p> <p>toluene emissions (point source and fugitive) shall not exceed 1.45 lbs/hr and 6.4 tons/yr;</p> <p>cumene emissions (point source and fugitive) shall not exceed 0.13 lb/hr and 0.6 ton/yr;</p> <p>ethyl benzene emissions (fugitive) shall not exceed 0.01 lb/hr and 0.06 ton/yr; and</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>xylylene emissions (fugitive) shall not exceed 0.10 lb/hr and 0.43 ton/yr. Total particulate emissions (PE) shall not exceed 2.66 lbs/hr and 11.6 tons/yr.</p> <p>Total nitrogen oxides (NOx) emissions shall not exceed 2.40 lbs/hr and 10.5 tons/yr.</p> <p>Total carbon monoxide (CO) emissions shall not exceed 0.37 lb/hr and 1.6 tons/yr.</p> <p>Total sulfur dioxide (SO2) emissions shall not exceed 1.54 lbs/hr and 6.8 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-21-09(DD), 40 CFR Part 60 Subpart DDD, and 40 CFR Part 60 Subpart VV.</p>
b.	OAC rule 3745-17-07(A)	Visible PE from the cyclone scrubber, dust collector and hot oil heater exhaust stacks shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-21-09(DD)	See b)(2)d.
d.	40 CFR Part 63, Subpart JJJ [40 CFR 63.1313 et. seq.]	The permittee shall reduce the HAP or TOC emissions from all process vents, as defined in 40 CFR 63.1312, in a combustion device to achieve 98 weight percent reduction or to achieve a concentration of 20 parts per million by volume (ppmv) on a dry basis, whichever is less stringent. If the permittee elects to comply with the 20 ppmv standard, the concentration shall include a correction to 3 percent oxygen only when supplemental combustion air is used to combust the emissions. Compliance may be based on either organic HAP or TOC



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)(1)	See b)(2)a.
f.	OAC rule 3745-21-09(CC)	See b)(2)a.
g.	40 CFR Part 60, Subpart VV	See b)(2)b.
h.	40 CFR Part 60, Subpart DDD	See b)(2)c.
i.	40 CFR Part 63, Subpart H [40 CFR 63.160 et. seq.]	The permittee shall comply with the equipment leak detection requirements in 40 CFR Part 63, Subpart H.
j.	40 CFR 63.1-63.15	Table 4 to 40 CFR, Part 63, Subpart H- Applicability of General Provisions to Subpart H shows which parts of the General Provisions in apply. Table 1 to 40 CFR, Part 63, Subpart JJJ- Applicability of General Provisions to Subpart H shows which parts of the General Provisions in apply.

(2) Additional Terms and Conditions

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. After the compliance dates specified in 40 CFR Part 63, Subpart JJJ, an affected source subject to this subpart that is also subject to the provisions of 40 CFR Part 60, Subpart VV, is required to comply only with the provisions of Subpart JJJ. After the compliance dates specified in this section, said source shall no longer be subject to 40 CFR Part 60, Subpart VV.
- c. Affected sources producing polystyrene resin using a continuous process subject to 40 CFR Part 63, Subpart JJJ, that are also subject to the provisions of 40 CFR Part 60, Subpart DDD, are required to comply only with Subpart JJJ. After the compliance dates specified in Subpart JJJ, said sources shall no longer be subject to 40 CFR Part 60, Subpart DDD.
- d. The requirements specified by this applicable rule are equivalent to or less stringent than the requirements specified by 40 CFR Part 63, Subpart JJJ.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas, #2 fuel oil, styrene distillate, and/or styrenic tars in the hot oil heaters associated with this emissions unit. Other fuels may be burned provided that the permittee obtains prior authorization from the Ohio EPA Southeast District Office, obtains any required permit modifications, and demonstrates compliance with all permit requirements. Emission testing may be requested by the Ohio EPA Southeast District Office.

[OAC rule 3745-77-07(A)(1) and PTI P0103699]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, #2 fuel oil, styrene distillate, styrenic tars, and/or other fuel authorized by the Ohio EPA Southeast District Office in the hot oil heaters associated with this emissions unit, the permittee shall maintain a record of the type and quantity of such fuel burned.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

- (2) The permittee shall collect and record the following information each month for this emissions unit:
- a. the amount of polystyrene produced, in pounds and tons;
 - b. the total hours of polystyrene production; and
 - c. the average hourly polystyrene production rate for the month, in pounds and tons [i.e., d)(2)a./d)(2)b.].

(Note: Polystyrene production hours include any time when one or more production line(s) associated with this emissions units is (are) in operation.)

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

- (3) Each calendar year, the permittee shall collect and record the annual polystyrene production rate, in pounds per year and tons per year, for this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone scrubber, dust collector and hot oil heater exhaust stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the

observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

- (5) The permittee shall comply with the applicable monitoring and record keeping required under 40 CFR Part 63, Subpart JJJ, including the following sections:

63.1317 and 63.1319(a)	If using a control device, comply with the applicable monitoring and record keeping provisions in 63.1315(a), except that references to group determinations (i.e., total resource effectiveness) do not apply and owners or operators are not required to comply with 63.113.
63.1315(a)	Comply with the requirements of 63.113 through 63.118
63.114	Monitoring requirements
63.117 and 63.118	Record keeping requirements
63.1331	Equipment leak provisions
63.1335	General record keeping provisions

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJ]

- (6) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart H, including the following sections:

63.163(a)	Light liquid service pump provisions
63.168(a)	Valves in light liquid service provisions
63.173(a)(1)	Monthly monitoring provisions for agitators in light liquid service
63.174(a)	Monitoring provisions for all connectors in light liquid service
63.175	Quality improvement program for valves
63.176	Quality improvement program for pumps
63.180(b), (d)	Monitoring requirements, determining



Effective Date: To be entered upon final issuance

	percent organic HAP content
63.181(a),(b),(c),(d), (h)(1) through (h)(9)	Provisions for one recordkeeping system, equipment information, documentation of inspection retention, documentation of leak detection, and additional record keeping

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart H]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, #2 fuel oil, styrene distillate, styrenic tars, and/or other fuel authorized by the Ohio EPA Southeast District Office was burned in the hot oil heaters associated with this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the cyclone scrubber, dust collector and/or hot oil heater exhaust stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PT P0103699]

- (3) The permittee shall comply with the applicable reporting required under 40 CFR Part 63, Subpart JJJ, including the following sections:

63.1320(a)	If using a control device, comply with the applicable reporting provisions in 63.1315(a), except that references to group determinations (i.e., total resource effectiveness) do not apply and owners or operators are not required to comply with 63.113.
63.1315(a)	Comply with the requirements of 63.113 through 63.118
63.117 and 63.118	Reporting requirements
63.1331	Equipment leak provisions
63.1335	General reporting provisions

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJ]



Effective Date: To be entered upon final issuance

- (4) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA Southeast District Office as are required pursuant to 40 CFR Part 63, Subpart H, per the following sections:

63.182(a),(b),(c)(1),(c)(4),(d)	Initial Notification, notification of compliance status, notification inclusions, and periodic reports
---------------------------------	--

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart H]

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:

Total point source VOC emissions shall not exceed 0.20 lb/hr and 0.9 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(2)c. by the permittee-supplied VOC emission factor of 0.003 pound per 1,000 pounds of product. The emission factor shall be updated whenever additional testing is performed.

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3) by the permittee supplied VOC emission factor, established during the most recent emission tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

- b. Emission Limitations:

Total fugitive VOC emissions shall not exceed 3.61 lbs/hr and 15.8 tpy.

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (tons/hr) in d)(2)c. by the permittee-supplied VOC emission factor of 0.2888 pound per ton of product (Chevron Air Emission Inventory Report, Radian Corporation 1995).



Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (tpy) in d)(3) by the permittee-supplied VOC emission factor of 0.2888 pound per ton of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

c. Emission Limitations:

Styrene emissions (point source and fugitive) shall not exceed 2.09 lbs/hr and 9.2 tpy.

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (pounds/hr) in d)(2)(c) by the permittee-supplied styrene emission factor of 0.0005 pound per 1,000 pounds of product to obtain the styrene emissions, in lbs/hr.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3). by the permittee supplied styrene emission factor, in pound of styrene per 1,000 pounds of product, established during the most recent emission tests, and by 0.0005 ton/lb then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

d. Emission Limitation:

Toluene emissions (point source and fugitive) shall not exceed 1.45 lbs/hr and 6.4 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (pounds/hr) in d)(2)(c). by the permittee-supplied toluene emission factor of 0.0005 pound per 1,000 pounds of product , established during the most recent stack tests.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3) by the permittee supplied toluene emission factor, in pound of toluene per 1,000 pounds of product, established during the most recent emissions tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

e. Emission Limitations:

Cumene emissions (point source and fugitive) shall not exceed 0.13 lb/hr and 0.6 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (pounds/hr) in d)(2)(c) by the permittee supplied cumene emission factor of 0.0006 pound per 1,000 pounds of product .

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3) by the permittee supplied cumene emission factor, in pound of cumene per 1,000 pounds of product established during the most recent emissions tests, and by 0.0005 ton/lb.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

f. Emission Limitations:

Ethyl benzene emissions (fugitive) shall not exceed 0.01 lb/hr and 0.06 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (pounds/hr) in d)(2)(c). by the permittee supplied ethyl benzene emission factor of 0.0005 pound per 1,000 pounds of product to obtain the ethyl benzene emissions, in lb/hr.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3). by the permittee supplied ethyl benzene emission factor, established during the most recent emissions test in pound of ethyl benzene per 1,000 pounds of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

g. Emission Limitations:

Xylene emissions (fugitive) shall not exceed 0.10 lb/hr and 0.43 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene production rate (pounds/hr) in d)(2)(c) by the permittee supplied xylene emission factor of 0.0005 pound per 1,000 pounds of product.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3) by the permittee supplied xylene emission established during the most recent emission tests, in pound of xylene per 1,000 pound of product, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

h. Emission Limitations:

Total PE shall not exceed 2.66 lbs/hr and 11.6 tons/yr.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(2)(c) by the permittee-supplied PM emission factor of 0.004 pound per 1,000 pounds of product to obtain the total point source PM emissions, in lb/hr. The emission factor shall be updated whenever additional testing is performed.

If required, compliance with the hourly PE limitation shall be determined in accordance with test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3) by the emissions unit specific particulate emission factor, established during the most recent emission tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

i. Emission Limitations:

NOx emissions shall not exceed 2.40 lbs/hr and 10.5 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(2)(c) by the permittee-supplied NOx emission factor of 0.006 pound per 1,000 pounds of product. The emission factor shall be updated whenever additional testing is performed.

If required, NOx emissions shall be determined in accordance with test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.



Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3) by the emission unit specific NO_x emission factor, in pound NO_x per 1,000 pounds of product, established during the most recent emission tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

j. Emission Limitations:

CO emissions shall not exceed 0.37 lb/hr and 1.6 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(2)(c) by the permittee supplied CO emission factor of 0.0004 pound per 1,000 pounds of. The emission factor shall be updated whenever additional testing is performed.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3) by the emissions unit-specific CO emission factor, in pound of CO per 1,000 pounds of product, established during the most recent emission tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

k. Emission Limitations:

SO₂ emissions shall not exceed 1.54 lbs/hr and 6.8 tpy.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the average hourly polystyrene rate (pounds/hr) in d)(2)(c) by the permittee supplied SO₂ emission factor of 0.02 pound per 1,000 pounds of product. The emission factor shall be updated whenever additional testing is performed.

Compliance with the annual emission limitation shall be demonstrated by multiplying the annual polystyrene production rate (pounds per year) in d)(3) by the emissions unit-specific SO₂ emission factor, in pound of SO₂ per 1,000 pounds of product, established during the most recent emission tests, and then dividing by 2000.

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

l. Emission Limitation:

Visible PE from the cyclone scrubber, dust collector and hot oil heater exhaust stacks shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.



Applicable Compliance Method:

If required, compliance with the visible PE shall be demonstrated based upon visible PE 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).

[OAC rule 3745-77-07(C)(1) and PTI P0103699]

m. Emission Limitation:

The permittee shall reduce the HAP or TOC emissions from all process vents, as defined in 40 CFR 63.1312, in a combustion device to achieve 98 weight percent reduction or to achieve a concentration of 20 parts per million by volume (ppmv) on a dry basis, whichever is less stringent. If the permittee elects to comply with the 20 ppmv standard, the concentration shall include a correction to 3 percent oxygen only when supplemental combustion air is used to combust the emissions. Compliance may be based on either organic HAP or TOC.

Applicable Compliance Method:

PET and Polystyrene Affected Sources - Testing and Compliance Demonstration Provisions

Continuous process vents using a control or recovery device to comply with 63.1316 shall comply with the applicable testing and compliance provisions for continuous process vents specified in 63.1315(a) except that, for purposes of this paragraph (a), references to group determinations (i.e., total resource effectiveness) do not apply and owners or operators are not required to comply with 63.113.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJ]

g) Miscellaneous Requirements

- (1) None.

4. P004, Product Handling

Operations, Property and/or Equipment Description:

Product Handling

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

(1) 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) [PTI 06-4855, issued 2/12/97]	Total particulate emissions (PE) shall not exceed 4.18 lbs/hr and 18.3 tpy. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)a.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:



- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

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:

PE shall not exceed 4.18 lbs/hr.

- Applicable Compliance Method:

If required, compliance with the hourly PE limitation shall be demonstrated based upon the emission testing methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

[OAC rule 3745-77-07(C)(1) and PTI 06-4855]

- b. Emission Limitation:

PE shall not exceed 18.3 tpy.



Draft Title V Permit
Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The annual limitation was developed based upon the following calculation using the PE factor provided by the permittee and the maximum annual operating hours:

$4.18 \text{ lbs/hr} \times 8760 \text{ maximum hours of operation/yr} \times 0.0005 \text{ tons/lb} = 18.3 \text{ tpy of particulate emissions}$

Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 06-4855]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Tanks: T001,T002,T013,T014,

EU ID	Operations, Property and/or Equipment Description
T001	Tank No. 530
T002	Tank No. 531
T013	Tank No. 502
T014	Tank No. 501

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

(1) 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 3745-21-07(M)	See b)(2)a.
b.	40 CFR Part 63, Subpart JJJ	See b)(2)b.

(2) Additional Terms and Conditions

a. This emission unit is not subject to the requirements of the rule because they do not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

b. The provisions of 40 CFR Part 63, Subpart JJJ do not apply to storage vessels containing styrene at existing affected sources.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.



Draft Title V Permit
Americas Styrenics, LLC
Permit Number: P0091070
Facility ID: 0684020001

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.