State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
PORTAGE COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 16-02320

DATE: 3/2/2004

The White Rubber Corporation
James R Sabo
PO Box 230
Ravenna, OH 44266

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **ARAQMD**

FINAL PERMIT TO INSTALL 16-02320

Application Number:	16-02320
APS Premise Number:	1667060021
Permit Fee:	**$1500**
Name of Facility:	The White Rubber Corporation
Person to Contact:	James R Sabo
Address:	PO Box 230 Ravenna, OH 44266

Location of proposed air contaminant source(s) [emissions unit(s)]:
837 N Cleveland Rd
Ravenna, Ohio

Description of proposed emissions unit(s):
Change in Method of Operation, Modify Existing Allowables. Installation of Additional Dipping Machines. Replaces PTI 16-02205 Issued 7/24/03.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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, 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. 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 are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

4. 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.

5. 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.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. 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.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. 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.

7. 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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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:

i. 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.

ii. 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 ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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 appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Permit Transfers

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Organic Compounds	**244.0***

* Total facility emissions, new emissions are 61.4 tons per year of new OC emissions.

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. The White Rubber Corporation, has requested to restrict the emissions of organic compounds to 244.0 tons per rolling, 12-month period. The company proposed these emission limits to avoid being classified as a major source for purposes of PSD applicability. The emissions units involved in the synthetic minor strategy are identified by OEPA as P009 and P010 (Glove and Sleeve Dipping), and P011 (Mix Operations).

2. In order to achieve the restricted organic compounds emissions limitation for emissions units P009, P010 and P011, the permittee has agreed to limit solvent usage or throughput to 8,200,000 pounds of solvent on a rolling 12-month basis.

3. The permittee has on hand sufficient records to begin calculating and tracking this rolling restriction upon issuance of this permit.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P009 - Dipping room, consisting of 116 dip machines, enclosed in a permanent total enclosure (PTE), and vented to a carbon adsorber unit (CAU) capable of a 95% control efficiency. The adsorber includes an integral condenser and scrubber. (Modification) Note: The CAU is shared with emissions units P010 and P011	OAC rule 3745-31-05(A)(3)	Combined emissions from dipping operations in P009 and P010 shall not exceed: *46.4 lbs/hr of organic compounds (OC) *203.2 tons per year of OC The installation and operation of a permanent total enclosure (PTE) and a carbon adsorber unit (CAU) with an overall control efficiency of at least 95%. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)	See A.II.1 below
	OAC rule 3745-31-05(C)	244.0 tons of organic compounds per rolling 12-month period from emissions units P009, P010 and P011. * New combined emissions as a result of the modification are 11.64 lbs/hr and 51.0

tons/yr of OC.

2. Additional Terms and Conditions

2.a The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2.b The permittee has the option to perform an additional demonstration to show that the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened), in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in Section A.I.2.b to show that the PTE cannot be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The requirements of this rule are less stringent than the requirements of OAC 3745-31-05 and BAT. The rule requires an eighty-five percent reduction in the organic material before discharge where the terms of this permit and BAT require a 95% reduction in these emissions.

2. The total mass steam flow rate to the carbon adsorber, for any carbon bed regeneration cycle, shall not be more than 10 percent below the minimum total mass steam flow rate for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance.

   Operation of the carbon adsorber below the specified mass steam flow rate is not necessarily an indication of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

3. The PTE shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, whenever the emissions unit is in operation.

   Operation of the permanent total enclosure below the specified pressure differential value is not necessarily an indication of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

4. In order to achieve the annual organic compounds emissions limitation from P009, P010 and P011, the permittee has agreed to limit solvent usage in emissions units P009, P010 and P011 to 8,200,000 pounds of solvent on a rolling 12-month basis.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous monitor and recorder which measures and records the steam flow rate to the carbon adsorber serving P009, P010 and P011. The monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

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

   a. the total mass steam flow rate to the carbon adsorber during each carbon bed regeneration cycle; and

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

2. The permittee shall operate and maintain monitoring devices which measure the pressure inside and outside the PTE. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

   The permittee shall record and maintain the following information on a daily basis:

   a. the difference in pressure between the PTE and the surrounding area(s) once per 8-hour shift; and

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

3. The permittee shall collect and record the following information for each month for the emissions units P009, P010 and P011:

   a. the company identification for each liquid organic material employed;

   b. the amount of all liquid organic material employed; in pounds

   c. the number of gallons of each liquid organic material employed;

   d. the OC content of each liquid organic material, in pounds per gallon;

   e. the OC emission rate for each liquid organic material, in tons per month;

   f. the total OC emission rate for all liquid organic materials, in tons per month;

   g. the total controlled OC emission rate for all liquid organic materials, in tons per month (i.e., calculated using the values from (f) and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

   h. the total number of hours the emissions unit was in operation during the month; and

   i. the average controlled hourly OC emission rate for all liquid organic materials, i.e., [(g)/(h)], in pounds per hour (average);

   j. The rolling 12 month solvent usage rate based on the amount of solvent input into the mixing process in pounds per rolling 12 month period.;

   k. The rolling 12 month summation of the total OC emissions from emissions units P009, P010 and P011

IV. Reporting Requirements

1. The permittee shall submit quarterly total mass steam flow rate deviation (excursion) reports that identify all carbon bed regeneration cycles during which the total mass flow steam rate was more than 10 percent below the minimum total mass steam flow rate for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

3. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated

emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

4. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each month during which the combined average hourly controlled OC emissions from these emissions units, P009 and P010 exceeded 46.4 lbs/hr, and the actual average hourly controlled OC emissions for each such month .

5. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

6. The permittee shall also submit annual reports which specify the OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

7. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each monthly record which the rolling 12 month input exceeded 8,200,000 pounds, and the actual solvent input in pounds for each such period.

8. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12 month OC emissions limitation for emissions units P009, P010 and P011.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Operational Restriction:

      use of a PTE and CAU with an overall control efficiency of 95%

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon the testing procedures specified in section A.V.2.

   b. Operational Restriction:

      8,200,000 pounds of solvent input per rolling 12 month period.

      Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

c. Emission Limitation:

46.4 lbs/hr of OC, Combined emissions from dipping operations in P009 and P010

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 and the testing requirements specified in section A.V.2.

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of each liquid organic compound.

d. Emission Limitation:

203.2 tons/yr. of OC, Combined emissions from dipping operations in P009 and P010.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

e. Emission Limitation:

244.0 tons OC per rolling 12-month period, combined emissions from emissions units P009, P010 and P011.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

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

a. The emission testing shall be conducted within 6 months of the expiration of the Title V permit issued 10/31/2001.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and overall control efficiency limitation for OC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, 40 CFR Part 60, Appendix A, Method 18, Method 25 or Method 25A, as appropriate. The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for OC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability,

necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18, Method 25 or Method 25A, as appropriate. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P009 - Dipping room, consisting of 116 dip machines, enclosed in a permanent total enclosure (PTE), and vented to a carbon adsorber unit (CAU) capable of a 95% control efficiency. The adsorber includes an integral condenser and scrubber. (Modification) Note: The CAU is shared with emissions units P010 and P011.	OAC rule 3745-31-05	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum

ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: VM&P naphtha

TLV (mg/m3): 1,370,000

Maximum Hourly Emission Rate (lbs/hr): 55.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1604

MAGLC (ug/m3): 32,619

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the

change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P010 - Dipping room, consisting of 52 dip machines, enclosed in a permanent total enclosure (PTE), and vented to a carbon adsorber unit (CAU) capable of a 95% control efficiency. The adsorber includes an integral condenser and scrubber. (Modification) Note: The CAU is shared with emissions units P009 and P011.	OAC rule 3745-31-05(A)(3)	Combined emissions from dipping operations in P009 and P010 shall not exceed: *46.4 lbs/hr of organic compounds (OC) *203.2 tons per year of OC The installation and operation of a permanent total enclosure (PTE) and a carbon adsorber unit (CAU) with an overall control efficiency of at least 95%. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)	See A.II.1 below.
	OAC rule 3745-31-05(C)	244.0 tons of organic compounds per rolling 12-month period from emissions units P009, P010 and P011. * New combined emissions as a result of

the modification are 11.64 lbs/hr and 51.0 tons/yr of OC.

2. Additional Terms and Conditions

2.a The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2.b The permittee has the option to perform an additional demonstration to show that the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened), in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in Section A.I.2.b to show that the PTE cannot be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The requirements of this rule are less stringent than the requirements of OAC 3745-31-05 and BAT. The rule requires an eighty-five percent reduction in the organic material before discharge where the terms of this permit and BAT require a 95% reduction in these emission.

2. The total mass steam flow rate to the carbon adsorber, for any carbon bed regeneration cycle, shall not be more than 10 percent below the minimum total mass steam flow rate for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance.

   Operation of the carbon adsorber below the specified mass steam flow rate is not necessarily an indication of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

3. The PTE shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, whenever the emissions unit is in operation.

   Operation of the permanent total enclosure below the specified pressure differential value is not necessarily an indication of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

4. In order to achieve the annual organic compounds emissions limitation from P009, P010 and P011, the permittee has agreed to limit solvent usage in emissions units P009, P010 and P011 to 8,200,000 pounds of solvent on a rolling 12-month basis**.**

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous monitor and recorder which measures and records the steam flow rate to the carbon adsorber serving P009, P010 and P011. The monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

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

   a. the total mass steam flow rate to the carbon adsorber during each carbon bed regeneration cycle; and

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

2. The permittee shall operate and maintain monitoring devices which measure the pressure inside and outside the PTE. The monitoring and devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

   The permittee shall record and maintain the following information on a daily basis:

   a. the difference in pressure between the PTE and the surrounding area(s) once per 8-hour shift; and

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

3. The permittee shall collect and record the following information for each month for the emissions units P009, P010 and P011:

   a. the company identification for each liquid organic material employed;

b. the amount of all liquid organic material employed; in pounds

c. the number of gallons of each liquid organic material employed;

d. the OC content of each liquid organic material, in pounds per gallon;

e. the OC emission rate for each liquid organic material, in tons per month;

f. the total OC emission rate for all liquid organic materials, in tons per month;

g. the total controlled OC emission rate for all liquid organic materials, in tons per month (i.e., calculated using the values from (f) and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

h. the total number of hours the emissions unit was in operation during the month; and

i. the average controlled hourly OC emission rate for all liquid organic materials, i.e., [(g)/(h)], in pounds per hour (average);

j. The rolling 12 month solvent usage rate based on the amount of solvent input into the mixing process in pounds per rolling 12 month period.;

k. The rolling 12 month summation of the total OC emissions from emissions units P009, P010 and P011.

IV. Reporting Requirements

1. The permittee shall submit quarterly total mass steam flow rate deviation (excursion) reports that identify all carbon bed regeneration cycles during which the total mass flow steam rate was more than 10 percent below the minimum total mass steam flow rate for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

3. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

4. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each month during which the combined average hourly controlled OC emissions from these

emissions units, P009 and P010, exceeded 46.4 lbs/hr, and the actual average hourly controlled OC emissions for each such month .

5. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

6. The permittee shall also submit annual reports which specify the OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

7. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each monthly record which the rolling 12 month input exceeded 8,200,000 pounds, and the actual solvent input in pounds for each such period.

8. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12 month OC emissions limitation for emissions units P009, P010 and P011.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Operational Restriction:

      use of a PTE and CAU with an overall control efficiency of 95%

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon the testing procedures specified in section A.V.2.

   b. Operational Restriction:

      8,200,000 pounds of solvent input per rolling 12 month period.

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

   c. Emission Limitation:

      46.4 lbs/hr of OC, Combined emissions from dipping operations in P009 and P010

      Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 and the testing requirements specified in section A.V.2.

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of each liquid organic compound.

d. Emission Limitation:

203.2 tons/yr. of OC, Combined emissions from dipping operations in P009 and P010.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

e. Emission Limitation:

244.0 tons OC per rolling 12-month period, combined emissions from emissions units P009, P010 and P011.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

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

a. The emission testing shall be conducted within 6 months of the expiration of the Title V permit issued 10/31/2001.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and overall control efficiency limitation for OC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for OC, 40 CFR Part 60, Appendix A, Method 18, Method 25 or Method 25A, as appropriate. The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for OC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18, Method 25 or Method 25A, as appropriate. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P010 - Dipping room, consisting of 52 dip machines, enclosed in a permanent total enclosure (PTE), and vented to a carbon adsorber unit (CAU) capable of a 95% control efficiency. The adsorber includes an integral condenser and scrubber. (Modification) Note: The CAU is shared with emissions units P009 and P011.	OAC rule 3745-31-05	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P010) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum

ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: VM&P naphtha

TLV (mg/m3): 1,370,000

Maximum Hourly Emission Rate (lbs/hr): 55.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1604

MAGLC (ug/m3): 32,619

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the

change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P011 - Mixing Operation, consisting of 38 mixing vessels, operated in a permanent total enclosure (PTE) and vented to a carbon adsorber unit (CAU) capable of a 95% control efficiency whenever emissions units P009 and P010 are in operation. The adsorber includes an integral condenser and scrubber. (Modification) Note: The CAU is shared with emissions units P009 and P010.	OAC rule 3745-31-05(A)(3)	9.36 lbs/hr of organic compounds (OC) 41.0 ton per year of OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C)
	OAC rule 3745-31-05(C)	244.0 tons of organic compounds per rolling 12-month period from emissions units P009, P010 and P011.

2. Additional Terms and Conditions

2.a The hourly mass OC emissions limitation regulated per OAC rule 3745-31-05(A)(3) are based upon accepted United States Environmental Protection Agency (USEPA) potential to emit procedures for this emissions unit.

II. Operational Restrictions

1. In order to achieve the annual organic compounds emissions limitation from P009, P010 and P011, the permittee has agreed to limit solvent usage in emissions units P009, P010 and P011 to 8,200,000 pounds of solvent on a rolling 12-month basis.

2. The PTE shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever emissions units P009 and P010 are in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the emissions units P009, P010 and P011:

   a. the company identification for each liquid organic material employed;

   b. the amount of all liquid organic material employed; in pounds

   c. the number of gallons of each liquid organic material employed;

   d. the OC content of each liquid organic material, in pounds per gallon;

   e. the total OC emission rate for all liquid organic material, in tons per month, by utilizing the following equation b. x 1%* /2000;

   f. the total number of hours the emissions unit was in operation during the month;

   g. the average hourly OC emission rate for all liquid organic materials, i.e., [(e)/(f)], in pounds per hour (average);

   h. the rolling 12 month solvent usage rate based on the amount of solvent input into the mixing process in pounds per rolling 12 month period; and,

   i. The rolling 12 month summation of the total OC emissions from emissions units P009, P010 and P011.

   * 1% estimated loss due to evaporation based on the solvent usage.

2. After the PTE for this emissions unit is installed, the permittee shall operate and maintain monitoring devices which measure the pressure inside and outside the PTE. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

   The permittee shall record and maintain the following information on a daily basis, when emissions units P009 and P010 are in operation:

a. the difference in pressure between the PTE and the surrounding area(s) once per 8-hour shift; and

b. a log or record of downtime for the capture (collection) system, control device, and monitoring equipment when emissions units P009 and P010 were in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each monthly record which the rolling 12 month input exceeded 8,200,000 pounds, and the actual solvent input in pounds for each such period.

2. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

3. The permittee shall also submit annual reports which specify the OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling 12 month OC emissions limitation for emissions units P009, P010 and P011.

5. After the PTE is installed, the permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above, when emissions units P009 and P010 are in operation.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Operational Restriction:

      8,200,000 pounds of solvent per rolling 12 month period.

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

   b. Emission Limitation:

      9.36 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section A.III.1.

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 18, Method 25, or Method 25A, as appropriate.

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of each liquid organic compound.

c. Emission Limitation:

41.0 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section A.III.1.

d. Emission Limitation:

244.0 tons OC per rolling 12-month period, combined emissions from emissions units P009, P010 and P011.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

VI. Miscellaneous Requirements

1. The Permittee has conducted a BAT cost effectiveness evaluation in conjunction with this PTI application and it was determined to be economically feasible to upgrade the capture efficiency of this emissions unit whenever emissions units P009 and P010 are in operation to increase the overall control efficiency. Therefore within six months of the issuance of this permit to install the Permittee shall install, troubleshoot and test a permanent total enclosure for this emissions unit.

2. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40

CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P011 - Mixing Operation, consisting of 38 mixing vessels, operated in a permanent total enclosure (PTE) and vented to a carbon adsorber unit (CAU) capable of a 95% control efficiency whenever emissions units P009 and P010 are in operation. . The adsorber includes an integral condenser and scrubber. (Modification) Note: The CAU is shared with emissions units P009 and P010.	OAC rule 3745-31-05	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P011) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for

each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: VM&P naphtha

TLV (mg/m3): 1,370,000

Maximum Hourly Emission Rate (lbs/hr): 55.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1604

MAGLC (ug/m3): 32,619

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the

change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None