



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

4/15/2016

Certified Mail

Robert Gordon
Tembec BTL SR Inc
2112 SYLVAN AVE.
Toledo, OH 43606

Facility ID: 0448010370
Permit Number: P0117372
County: Lucas

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, Toledo Blade. 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 Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

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 Toledo Department of Environmental Services at (419)936-3015.

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*
TDES; Michigan; Indiana

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

Tembec BTL SR Inc

2112 SYLVAN AVE., , Toledo, OH 43606

ID#: P0117372

Date of Action: 4/15/2016

PermitDesc: Title V renewal permit for producer of liquid formaldehyde resins..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Craig Miles, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



Statement of Basis
 Tembec BTL SR Inc
Permit Number: P0117372
Facility ID: 0448010370

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0448010370
Facility Name:	Tembec BTL SR Inc
Facility Description:	Producer of liquid formaldehyde resins
Facility Address:	2112 SYLVAN AVE., Toledo, OH 43606
Permit #:	P0117372 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 type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" 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)?	Y
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



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)	P001: Monitoring and recordkeeping revised due to replacing the scrubber with a bag house. P001-P003: Particulate emissions reduced from 5.14 lbs/hr to 3.82 lbs/hr as requested in EAC forms by James Bennett (Tembec Plant Engineer) P001-P003 OAC rule 3745-21-07(M)(2) has been vacated. On March 29, 2016, OAC rule 3745-21-07(M)(1) was revised to remove this emissions unit from the table of affected emissions units; therefore, the OAC 21-07 rule that was in effect prior to this date is no longer part of the State regulations. Ohio EPA initially added this emissions unit to OAC rule 3745-21-07(M)(1) in error, and Ohio EPA will be submitting the rule change to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). P008-P012 Updated requirements for 40 CFR Part 63, Subpart OOO. P007: Emission unit has been changed to "permanently shutdown" by facility. P008-P011: Particulate emissions increased from 1.8 lbs/hr to 3.2 lbs/hr P012: Particulate emissions increased from 1.8 lbs/hr to 5.9 lbs/hr P008-P012: The reactors contain no pressure relief devices, per James Bennett of Tembec.
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.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1.	N	Y	Federal/State enforceable standard terms
B.2.	N	Y	40 CFR Part 63, Subpart A requirements, 40 CFR 63, Subpart OOO, requirements – MACT for the Manufacture of Amino/Phenolic Resins, and 40 CFR 63, Subpart UU, requirements – MACT standards for Equipment Leaks, Control Level 2.
B.3.	N	Y	This facility developed and registered a risk management plan (RMP) pursuant to section 112(r) of the Act and, therefore, is subject to Section 112(r) of the Act. RMP is located in "Supporting Documents" folder on



Statement of Basis
Tembec BTL SR Inc
Permit Number: P0117372
Facility ID: 0448010370

			share drive in "P0117372 Renewal 2014" folder ->L:\aa Shared\AIR\Facility\0448010370\Permits.
B.4.	77	N	SIP. Insignificant emissions units with applicable requirements are listed.



C. Emissions Unit Terms and Conditions

Key:													
EU = emissions unit ID							R = record keeping requirements						
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)							Rp = reporting requirements						
OR = operational restriction							ET = emission testing requirements (not including compliance method terms)						
M = monitoring requirements							St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement						
ENF = did noncompliance issues drive the monitoring requirements?							Misc = miscellaneous requirements						
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B001 and B002 4.185 mmBtu boiler, natural gas/#2 fuel oil/#6 fuel oil	20 percent opacity, as a 6-minute average.	17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR - Use compliant fuel, for #2 fuel oil and natural gas combustion appropriate "clean fuel" terms have been included for M, R and Rp. M, R, &Rp - OEPA clean fuel requirements M, R &Rp - For #6 oil only, 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit, between actual emissions tests. Daily was chosen as a reasonable and practical monitoring frequency as no. 6 fuel oil is emergency standby only. ET - not required per Engineering Guide #16 due to the low level of emissions.
	0.4 pound/mmBtu PE	17-10(C)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR - Use compliant fuel, for #2 fuel oil and natural gas combustion appropriate "clean fuel" terms have been included for M, R &Rp. CAM is not applicable; PTE < 100 tpy. M, R &Rp - For #6 oil only, 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. ET - not required per Engineering Guide #16 due to the low level of emissions.
	None	18-06(B)	N	Y	N	N	N	N	N	N	N	N	ND - Exempt; input capacity less than 10 mmBtu/hr
P001 Resin dryer with baghouse	3.8 lbs/hr of particulate emissions	17-11(B)(1)	N	N	Y	Y	N	Y	Y	N	N	N	CAM is not applicable; maximum PTE = 17 tpy (< 100 tpy). ET - emissions testing is not required per Engineering Guide #16 due to the low level of emissions.



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		21-07(M)(2)	N	Y									On March 29, 2016, OAC rule 3745-21-07(M)(1) was revised to remove this emissions unit from the table of affected emissions units; therefore, the OAC 21-07 rule that was in effect prior to this date is no longer part of the State regulations. Ohio EPA initially added this emissions unit to OAC rule 3745-21-07(M)(1) in error, and Ohio EPA will be submitting the rule change to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).
Emissions vented to baghouse at all times		77-07(C)(1)	N	N	N	Y	N	Y	Y	N	N	N	<p>M, R, and Rp– appropriate monitoring, record keeping, and reporting requirements have been specified to assure equipment is operating at the specified differentials.</p> <p>ET – emissions testing is not required per Engineering Guide #16 due to the low level of emissions.</p>
20 percent opacity, as a 6-minute average.		17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	<p>OR, M, R &Rp - appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction to operate the baghouse whenever this emissions unit is loading feed stock.</p> <p>ET – emissions testing is not required per Engineering Guide #16 due to the low level of emissions.</p>
Equipment leaks, controlled by equipment design and operating and maintenance programs													
LDAR		N	Y	Y	N	N	N	N	N	N	N	N	<p>ND – The permittee has indicated that no equipment contains or contacts 5 weight percent HAP or greater.</p>
Continuous Process Vent													



Statement of Basis
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	None	N	Y	Y	N	N	N	N	N	N	N	N	Basis - 40 CFR Part 63, Subpart 000. ND - Continuous Process Vent limits do not apply since TRE is greater than 1.2.
Heat Exchangers and Pressure Relief Devices													
	None	N	Y	Y	N	N	N	N	N	N	N	N	Basis - 40 CFR Part 63, Subpart 000. ND - The permittee has indicated there are no heat exchangers or pressure relief devices at this EU.
P002 & P003 Resin dryers with wet scrubber	20 percent opacity, as a 6-minute average.	17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	M, R&Rp- weekly daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack. ET - emissions testing is not required per Engineering Guide #16 due to the low level of emissions.
	3.8 lbs/hr of particulate emissions	17-11(B)(1)	N	N	Y	Y	N	Y	Y	N	N	N	CAM is not applicable; maximum PTE = 17 tpy (< 100 tpy). ET - emissions testing is not required per Engineering Guide #16 due to the low level of emissions.
		21-07(M)(2)	N	Y									On March 29, 2016, OAC rule 3745-21-07(M)(1) was revised to remove this emissions unit from the table of affected emissions units; therefore, the OAC 21-07 rule that was in effect prior to this date is no longer part of the State regulations. Ohio EPA initially added this emissions unit to OAC rule 3745-21-07(M)(1) in error, and Ohio EPA will be submitting the rule change to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).
Equipment leaks, controlled by equipment design and operating and maintenance programs													



Statement of Basis
 Tembec BTL SR Inc
Permit Number: P0117372
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	LDAR	N	Y	Y	N	N	N	N	N	N	N	N	ND – The permittee has indicated that no equipment contains or contacts 5 weight percent HAP or greater.
	Continuous Process Vent												
	None	N	Y	Y	N	N	N	N	N	N	N	N	Basis - 40 CFR Part 63, Subpart OOO. ND - Continuous Process Vent limits do not apply since TRE is greater than 1.2.
	Heat Exchangers and Pressure Relief Devices												
	None	N	Y	Y	N	N	N	N	N	N	N	N	Basis - 40 CFR Part 63, Subpart OOO. ND - The permittee has indicated there are no heat exchangers or pressure relief devices at this EU.
P008 through P012, amino/phenolic resin processing units, Reactors #1 through #5													
	general provisions	N	Y	N	N	Y	N	Y	Y	N	N	N	Basis - 40 CFR Part 63, Subpart A
	Reactor batch process vent controlled by a condenser with spray wash system												
	20 percent opacity, as a 6-minute average.	17-07(A)(1)	N	N	Y	Y	N	Y	Y	N	N	N	OR, M, R &Rp - appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction to operate the condenser water wash system whenever this emissions unit is loading feed stock. ET – emissions testing is not recommended per Engineering Guide #16 due to the low level of emissions.
	3.2 lbs/hr particulates (P008-P011) 5.9 lbs/hr particulates (P012)	17-11(B)(1)	N	N	Y	Y	N	Y	Y	N	N	N	Basis - Table I applies ($E=4.10P^{0.67}$) where $P = 0.695$ (1390 lbs/hr / 2000 lbs/ton = 0.695 tons/hr) for P008-P011 and $P = 1.74$ (3475 lbs/hr / 2000 lbs/ton = 1.74 tons/hr) for P012. OR, M, R, &Rp - appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and CAM is not applicable; PTE < 100 tpy.
Reactor Batch	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis - 40 CFR Part 63, Subpart OOO, requires a HAP	



Statement of Basis
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Process Vent													reduction of 83%, by weight, over the batch cycle using a condenser coil; or to 0.0057 pound of per 1,000 pounds of non-solvent based resin produced and 0.0567 pound of HAPs per 1000 pounds of solvent based resin. OR, M, R, &Rp - appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restrictions. 35 kilopascal exempts the heat exchanger from Subpart OOO applicability. Maximum condenser discharge temperature established to assure appropriate HAP reduction. CAM is not applicable; PTE < 10 tpy. ET – not required per Engineering Guide #16
Heat Exchange Systems													
None	N	Y	Y	Y	Y	N	Y	Y	N	N	N		Basis - 40 CFR Part 63, Subpart OOO. ND - no applicable requirements in 40 CFR Part 63, Subpart OOO for existing heat exchange systems (cooling coils) operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. OR, M, R &Rp – appropriate monitoring, record keeping, and reporting requirements have been specified to assure equipment is operating at the specified pressure differentials.
Equipment leaks, controlled by equipment design and operating and maintenance programs													
LDAR	N	Y	N	Y	Y	N	Y	Y	N	N	N		Basis – Compliance with 40 CFR Part 63, Subpart UU satisfies LDAR requirements for 40 CFR 63, Subpart OOO. OR, M, R &Rp –appropriate monitoring, record keeping, and reporting measurements have been specified to assure repair requirements and valve identification are being complied with.
Storage Vessels													



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Tembec BTL SR Inc**

Facility ID:	0448010370
Permit Number:	P0117372
Permit Type:	Renewal
Issued:	4/15/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Tembec BTL SR Inc

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Draft Title V Permit
Tembec BTL SR Inc
Permit Number: P0117372
Facility ID: 0448010370

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448010370
Facility Description:
Application Number(s): A0041886, A0050543, A0051566, A0051698, A0051837
Permit Number: P0117372
Permit Description: Title V renewal permit for producer of liquid formaldehyde resins.
Permit Type: Renewal
Issue Date: 4/15/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0107012

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

Tembec BTL SR Inc
2112 SYLVAN AVE.
Toledo, OH 43606

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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 Toledo Department of Environmental Services. 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
Tembec BTL SR Inc
Permit Number: P0117372
Facility ID: 0448010370
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 maintenance requests, 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 Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services) 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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, no emissions 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 Toledo Department of Environmental Services.
- 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 Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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.



Draft Title V Permit
Tembec BTL SR Inc
Permit Number: P0117372
Facility ID: 0448010370

Effective Date: To be entered upon final issuance

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 Toledo Department of Environmental Services, 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
Tembec BTL SR Inc
Permit Number: P0117372
Facility ID: 0448010370
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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 emissions units contained in this permit are subject to the applicable requirements of 40 CFR Part 63, Subparts A, OOO, and UU: P001, P002, P003, P008, P009, P010, P011 and P012. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.
3. This facility developed and registered a risk management plan pursuant to section 112(r) of the Act and, therefore, is subject to Section 112(r) of the Act. Pursuant to Section 112(r) of the Act, plans must be revised and resubmitted every five years.
4. The following insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emission 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 and 3745-21.
 - b) P013 – emergency electrical generator (permit by rule)
[Authority for Term: OAC rule 3745-77-07(A)(13)]



Draft Title V Permit
Tembec BTL SR Inc
Permit Number: P0117372
Facility ID: 0448010370
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group – Boilers: B001 & B002

EU ID	Operations, Property and/or Equipment Description
B001	4.185 mmBtu/hr boiler, fired with natural gas, no. 2 fuel oil and/or no. 6 fuel oil, with no controls / Boiler #1
B002	4.185 mmBtu/hr boiler, fired with natural gas, no. 2 fuel oil and/or no. 6 fuel oil, with no controls / Boiler #2

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 3745-17-07(A)(1)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(C)(1)	0.4 pound of particulate emissions per million Btu actual heat input
c.	OAC rule 3745-18-06	Exempt, see b)(2)a.

(2) Additional Terms and Conditions

a. Fueling burning equipment which has rated heat input capacities equal to, or less than, 10 mmBtu/hr total rated capacity are exempt from the requirements of this rule.

c) Operational Restrictions

(1) The permittee shall burn only natural gas, no. 2 fuel oil and/or no. 6 fuel oil in this emissions unit.

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

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

- (1) For each day during which the permittee burns a fuel other than natural gas, no. 2 fuel oil and/or no. 6 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

- (2) For each day during which the permittee burns no. 6 fuel oil, 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 stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. 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 daily 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.

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

e) **Reporting Requirements**

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, no. 2 fuel oil and/or no. 6 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

- (2) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

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

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

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

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

- b. Emission Limitation:

0.4 pound of particulate emissions per million Btu actual heat input

Applicable Compliance Method:

When burning natural gas, compliance may be demonstrated by dividing the particulate emission factor for natural gas combustion (1.9 lbs/mmcuft) obtained from AP-42, 5th Edition, Table 1.4-2, dated July, 1998, by the heating value of natural gas (1020 mmBtu/mmcuft).

When burning no. 2 fuel oil, compliance may be demonstrated by dividing the particulate emission factor for no. 2 fuel oil combustion (2 lbs/1000 gal) obtained from AP-42, 5th Edition, Table 1.3-1, dated September, 1998, by the heating value of no. 2 fuel oil (140 mmBtu/1000 gal).

When burning no. 6 fuel oil, compliance may be demonstrated by dividing the particulate emission factor for no. 6 fuel oil combustion (10 lbs/1000 gal) obtained from AP-42, 5th Edition, Table 1.3-1, dated September, 1998, by the heating value of no. 6 fuel oil (150 mmBtu/1000 gal).



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If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the method(s) and procedures specified in OAC rule 3745-17-03(B)(9).

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

g) Miscellaneous Requirements

- (1) None.



2. P001, "A" System Resin Spray Dryer

Operations, Property and/or Equipment Description:

"A" System Resin Spray Dryer With Baghouse

- 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
amino/phenolic resin processing unit, general provisions		
a.	40 CFR 63, Subpart A (40 CFR 63.1-15)	Table 1 to Subpart OOO of 40 CFR Part 63 – Applicability of General provisions to Subpart OOO shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
b.	40 CFR Part 63, Subpart OOO [In accordance with 40 CFR 63.1400(a), this emissions unit is an amino/phenolic resin process unit existing affected source located at a major source of HAP emissions subject to the emissions limitations/control measures specified in this section.]	As indicated below, there are no applicable emissions limitations or control measures required by this rule, however, the work practice standards under 40 CFR 63.1410 apply.
Resin Spray Dryer continuous process vent with Baghouse		
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
d.	OAC rule 3745-17-11(B)(1)	3.8 lbs/hr of particulate emissions (PE)
e.	OAC rule 3745-77-07(C)(1)	See b)(2)a.
f.	40 CFR Part 63, Subpart OOO [In accordance with 40 CFR 63.1400(a), this emissions unit is an amino/phenolic resin process unit existing affected source located at a major source of HAP emissions	See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	subject to the emissions limitations/control measures specified in this section.]	
g.	OAC rule 3745-21-07(M)(1)	See b(2)c.
Heat exchange Systems		
h.	40 CFR 63, Subpart OOO (40 CFR 63.1409(a)(1))	The permittee has indicated that there are no heat exchangers on this emissions unit.
Equipment leaks, controlled by equipment design and operating and maintenance programs		
i.	40 CFR 63, Subpart OOO (40 CFR 63.1410) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pumps, compressors, agitators, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.]	The permittee has indicated that no equipment contains or contacts 5 weight percent HAP or greater.
Pressure relief devices		
j.	40 CFR 63, Subpart OOO (40 CFR 63.1411) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pressure relief devices in organic HAP service.]	The permittee has indicated that there are no pressure relieved devices in organic HAP service.
Storage vessels		
k.	40 CFR 63, Subpart OOO (40 CFR 63.1404(a)) [In accordance with 40 CFR 63.1404(a), these requirements apply to storage vessels with a capacity of: greater than or equal to 20,000 gallons, but less than 40,000 gallons and vapor pressure of 1.9 pounds per square inch absolute (psia); greater than or equal to 40,000 gallons, but less than 90,000 gallons, and a vapor pressure of 0.75 psia or greater; or has a capacity of 90,000 gallons or greater and vapor pressure of 0.15 psia or greater.]	There are no applicable storage vessel requirements specified by this rule, since all storage vessels have a capacity of less than 20,000 gallons.

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.
- b. In a report submitted to Ohio EPA on 7/29/2015, the permittee determined the Total Resource Effectiveness (TRE) index value for this emissions unit to be 74.2. Since the TRE index value is reported to be greater than 1.2, 40 CFR 63.1405 does not establish an emissions standard for the continuous process vent.
- c. On March 29, 2016, OAC rule 3745-21-07(M)(1) was revised to remove this emissions unit from the table of affected emissions units; therefore, the OAC 21-07 rule that was in effect prior to this date is no longer part of the State regulations. Ohio EPA initially added this emissions unit to OAC rule 3745-21-07(M)(1) in error, and Ohio EPA will be submitting the rule change to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). The following terms and conditions shall become void after U.S. EPA approves the rule revision:

[b)(1)g.]

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 5.0 inches of water.

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

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;



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- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart OOO, including the following sections:

63.1416(a)	requirements for data reports and records
63.1416(f)(1)	records shall be maintained of total resource effectiveness (TRE) index value determinations
63.1416(f)(2)	volumetric flow rate records shall be kept

63.1416(f)(3)	records of organic HAP concentration shall be kept
63.1416(f)(4)	records of process changes shall be kept
63.1022(a)	identification requirements
63.1022(b)	additional equipment identification
63.1022(c) through (f)	special equipment designations
63.1038(a)	combined recordkeeping for more than one regulated source

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
- c. each incident of deviation described in d)(2) where a prompt investigation was not conducted;
- d. each incident of deviation described in d)(2) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in d)(2) where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit reports and other such notifications and reports via the air services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections. Per 40 CFR 63.1410, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU (except 63.1030), including the following sections:



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63.1417(e)	within 150 days of compliance date a Notification of Compliance Status shall be submitted.
63.1417(b)	general reporting requirements
63.1417(f)(1), (f)(2)	semi-annual reports
63.1417(f)(12)	quarterly reports
63.1417(g)	failure to meet an applicable standard
63.1417(h)(4)	changes to the primary product for an amino/phenolic resin process units (APPUs)
63.1417(h)(5)	addition of APPUs or emissions points

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A..

[OAC rule 3745-17-03(B)(1)(a)]

b. Emissions Limitation:

3.8 pounds of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

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



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

63.1414(d)(10)	determining emissions by engineering assessment for continuous process vents
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g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group – “B” and “C” resin dryers: P002, P003

EU ID	Operations, Property and/or Equipment Description
P002	Resin dryer "B" with wet scrubber
P003	Resin dryer "C" with wet scrubber

- 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
amino/phenolic resin processing unit, general provisions		
a.	40 CFR 63, Subpart A (40 CFR 63.1-15)	Table 1 to Subpart OOO of 40 CFR Part 63 – Applicability of General provisions to Subpart OOO shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
b.	40 CFR Part 63, Subpart OOO [In accordance with 40 CFR 63.1400(a), this emissions unit is an amino/phenolic resin process unit existing affected source located at a major source of HAP emissions subject to the emissions limitations/control measures specified in this section.]	As indicated below, there are no applicable emissions limitations or control measures required by this rule, however, the work practice standards of 40 CFR 63.1410 apply.
Resin Spray Dryer continuous process vent with Wet Scrubber		
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average.
d.	OAC rule 3745-17-11(B)(1)	3.8 lbs/hr of particulate emissions (PE)
e.	40 CFR Part 63, Subpart OOO [In accordance with 40 CFR 63.1400(a), this emissions unit is an amino/phenolic resin process unit existing affected source located at a major source of HAP emissions	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	subject to the emissions limitations/control measures specified in this section.]	
f.	OAC rule 3745-21-07(M)(1)	See b(2)b.
Heat exchange systems		
g.	40 CFR 63, Subpart OOO (40 CFR 63.1409(a)(1))	The permittee has indicated that there are no heat exchangers on this emissions unit.
Equipment leaks, controlled by equipment design and operating and maintenance programs		
h.	40 CFR 63, Subpart OOO (40 CFR 63.1410) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pumps, compressors, agitators, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.]	The permittee has indicated that no equipment contains or contacts 5 weight percent HAP or greater.
Pressure relief devices		
i.	40 CFR 63, Subpart OOO (40 CFR 63.1411) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pressure relief devices in organic HAP service.]	The permittee has indicated that there are no pressure relief devices in organic HAP service.
Storage vessels		
j.	40 CFR 63, Subpart OOO (40 CFR 63.1404(a)) [In accordance with 40 CFR 63.1404(a), these requirements apply to storage vessels with a capacity of: greater than or equal to 20,000 gallons, but less than 40,000 gallons and vapor pressure of 1.9 pounds per square inch absolute (psia); greater than or equal to 40,000 gallons, but less than 90,000 gallons, and a vapor pressure of 0.75 psia or greater; or has a capacity of 90,000 gallons or greater and vapor pressure of 0.15 psia or greater.]	There are no applicable storage vessel requirements specified by this rule, since all storage vessels have a capacity of less than 20,000 gallons.

(2) Additional Terms and Conditions

- a. In a report submitted to Ohio EPA on 7/29/2015, the permittee determined the Total Resource Effectiveness (TRE) index value for Emissions Unit P002 to be 13.2 and 3.4 for P003. Since the TRE index value is reported to be greater than 1.2, 40 CFR 63.1405 does not establish an emissions standard for the continuous process vents from these emissions units.
- b. On March 29, 2016, OAC rule 3745-21-07(M)(1) was revised to remove this emissions unit from the table of affected emissions units; therefore, the OAC 21-07 rule that was in effect prior to this date is no longer part of the State regulations. Ohio EPA initially added this emissions unit to OAC rule 3745-21-07(M)(1) in error, and Ohio EPA will be submitting the rule change to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). The following terms and conditions shall become void after U.S. EPA approves the rule revision:

[b)(1)f.]

c) Operational Restrictions

- (1) None

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record at the beginning of each shift for each day the emissions unit is in operation that there was visual confirmation that the scrubber pump is running and that the flow rate from the drain lines is adequate.

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

- (2) The permittee shall collect and record the following information at every system start-up:

- a. visually inspect the scrubber chamber and the orifices to ensure that they are free from blockage;
- b. conduct a water flow test for the orifices, and visually confirm that they are free from blockage;
- c. install the water nozzles into the orifices, and again conduct a visually confirmed water flow test;
- d. visually inspect the demister bundles to ensure that they are not overloaded or ready to be changed;
- e. conduct a start up test of the scrubber unit, and visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate; and
- f. visually confirm that the stack emissions are being properly controlled.

(Authority for term: 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 stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions 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(A)(3)]

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

63.1416(a)	requirements for data reports and records
63.1416(f)(1)	records shall be maintained of total resource effectiveness (TRE) index value determinations
63.1416(f)(2)	volumetric flow rate records shall be kept
63.1416(f)(3)	records of organic HAP concentration shall be kept
63.1416(f)(4)	records of process changes shall be kept
63.1022(a)	identification requirements
63.1022(b)	additional equipment identification
63.1022(c) through (f)	special equipment designations

63.1038(a)	combined recordkeeping for more than one regulated source
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e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify each day during which the scrubber inspection form(s) indicates a problem with scrubber operation, (b) the cause(s) of the problem and (c) the corrective action which has been or will be taken to prevent similar problems in the future.

The semiannual reports shall be submitted each year by January 31 (covering July to December) and July 31 (covering January to June), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

- (2) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall submit reports and other such notifications and reports via the air services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections. Per 40 CFR 63.1410, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU (except 63.1030), including the following sections:

63.1417(e)	within 150 days of compliance date a Notification of Compliance Status shall be submitted.
63.1417(b)	general reporting requirements
63.1417(f)(1), (f)(2)	semi-annual reports
63.1417(f)(12)	quarterly reports
63.1417(g)	failure to meet an applicable standard

63.1417(h)(4)	changes to the primary product for an amino/phenolic resin process units (APPUs)
63.1417(h)(5)	addition of APPUs or emissions points

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:

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

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

3.8 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

(2) The permittee shall comply with the applicable compliance requirements required under 40 CFR Part 63, Subpart OOO, including the following sections:

63.1414(d)(10)	determining emissions by engineering assessment for continuous process vents
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g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Reactors: P008, P009, P010, P011

EU ID	Operations, Property and/or Equipment Description
P008	reactor used to produce liquid resin / Reactor #1
P009	reactor used to produce liquid resin / Reactor #2
P010	reactor used to produce liquid resin / Reactor #3
P011	reactor used to produce liquid resin / Reactor #4

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
amino/phenolic resin processing unit, general provisions		
a	40 CFR 63, Subpart A (40 CFR 63.01-15)	Table 1 to Subpart OOO of 40 CFR Part 63 – Applicability of General provisions to Subpart OOO shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
b.	40 CFR 63, Subpart OOO (40 CFR 63.1400–1419) [In accordance with 40 CFR 63.1400(a), this emissions unit is an amino/phenolic resin process unit existing affected source located at a major source for hazardous air pollutants (HAPs).]	The provisions of this subpart, except as allowed under 63.1403(b), apply to the owner or operator of an affected source who shall comply with the provisions of §§63.1404 through 63.1410, as appropriate. When emissions are vented to a control device or control technology as part of complying with this subpart, emissions shall be vented through a closed vent system meeting the requirements of 40 CFR part 63, subpart SS (national emission standards for closed vent systems, control devices, recovery devices). [63.1403(a)] see b)(2)a.
Reactor batch process vent controlled by a condenser with spray wash system		

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)(1)	3.2 lbs/hr of particulate emissions
e.	40 CFR 63, Subpart OOO (40 CFR 63.1406(a)(2), (a)(2)(ii) or (iii))	See b)(2)b. and b)(2)c.
heat exchange systems		
f.	40 CFR 63, Subpart OOO (40 CFR 63.1409(a)(1))	Exemption from the leak detection and repair requirements for existing heat exchange systems (cooling coils) operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.
equipment leaks, controlled by equipment design and operating and maintenance programs		
g.	40 CFR 63, Subpart OOO (40 CFR 63.1410) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pumps, compressors, agitators, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.]	See b)(2)d. and e.
Pressure relief devices		
h.	40 CFR 63, Subpart OOO (40 CFR 63.1411) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pressure relief devices in organic HAP service.]	The permittee has indicated that there are no pressure relief devices in organic HAP service.
storage vessels		
i.	40 CFR 63, Subpart OOO (40 CFR 63.1404(a)) [In accordance with 40 CFR 63.1404(a), these requirements apply to storage vessels with a capacity of: greater than or equal to 20,000 gallons, but less than 40,000	There are no applicable requirements for existing storage vessels with a capacity of less than 20,000 gallons. The permittee has indicated that all storage vessels have a capacity of less than 20,000 gallons



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	gallons and vapor pressure of 1.9 pounds per square inch absolute (psia); greater than or equal to 40,000 gallons, but less than 90,000 gallons, and a vapor pressure of 0.75 psia or greater; or has a capacity of 90,000 gallons or greater and vapor pressure of 0.15 psia or greater.]	

(2) Additional Terms and Conditions

a. Applicability 63.1400(k)

- i. The emissions limitations set forth in 40 CFR Part 63, Subpart OOO apply at all times, except during periods of non-operation of the affected source (or specific portion thereof) resulting in cessation of the emissions to which this subpart applies.
- ii. The emission limitations set forth in 40 CFR part 63, subpart UU, as referred to in § 63.1410, shall apply at all times except during periods of non-operation of the affected source (or specific portion thereof) in which the lines are drained and depressurized resulting in cessation of the emissions to which § 63.1410 applies.
- iii. The owner or operator shall not shut down items of equipment that are required or utilized for compliance with this subpart during times when emissions are being routed to such items of equipment if the shutdown would contravene requirements of this subpart applicable to such items of equipment.
- iv. At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

- b. Except as otherwise provided in 40 CFR 63.1406, the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

- i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or
- ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.
- c. As an alternative to complying with the limitations of 40 CFR 63.1406(a), the permittee may vent all organic HAP emissions from the reactor batch process vent to a non-combustion control device achieving an outlet organic HAP concentration of 50 ppmv or less.
- d. Except as otherwise provided in 40 CFR Part 63, Subpart OOO, the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU. These requirements are described in 40 CFR 63.1029 and 63.1410.
- e. The Notification of Compliance Status report submitted 6/18/2003 indicates that the permittee is subject to the requirements in 40 CFR Part 63, Subpart UU for equipment in heavy liquid service, and indicates that there is no equipment in gas or light liquid service.

c) Operational Restrictions

- (1) The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

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

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections. Per 40 CFR 63.1410, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU (except 63.1030), including the following sections:

63.1409(a)	Exempt from heat exchanger leak detection and repair requirements, provided that the minimum pressure on the cooling water side is maintained at least 35 kilopascals (5.08 psi) greater than the maximum pressure on the process side.
63.1410	The permittee shall comply with 40 CFR Part 63, Subpart UU (except 63.1030) for all equipment, as defined under 40 CFR 63.1402, that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more.
63.1413(a)	Establishment of parameter monitoring levels for the reactor continuous process vent condenser based on a design evaluation or performance test, in compliance

	with the requirements of 40 CFR 63.1413 for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO, these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in b)(1)g.
63.1022	Requirements of 40 CFR Part 63, Subpart UU from all equipment (except 63.1030), as defined under 40 CFR 63.1402, that contains or contacts 5 weight percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.
63.1024(a)	Repair of leaking equipment.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall (a) maintain and operate and (b) record daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

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

- (2) The permittee shall maintain daily records of a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum.

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

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections. Per 40 CFR 63.1410, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU (except 63.1030), including the following sections:

63.1413(a)	Requirement to establish parameter monitoring levels of the reactor continuous process vent condenser.
63.1415(a), (a)(1), (b)(3)	The maintenance and operation of a reactor continuous process vent condenser exit temperature monitoring device equipped with a continuous recorder is required.
63.1416(a)	Data retention requirements.
63.1416(b)	Malfunction records. Record the number of failures to meet an applicable

	standard, and for each failure, record the date, time, and duration of each failure. For each failure to meet an applicable standard, record and maintain a list of affected sources or equipment, an estimate of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions. Record actions taken to minimize emissions in accordance with 63.14200(h)(4), and any corrective actions taken to return the affected unit to its normal or usual manner of operation.
63.1416(c)	Maintain continuous records of reactor continuous process vent condenser exit temperature as specified in 63.1416(c)(1) through (c)(6).
63.1416(d)	Record keeping for batch process vent.
63.1416(g)	Maintain records of continuous monitoring system calibration checks and records documenting maintenance.
63.1416(h)	Reduced recordkeeping program requirements.
63.1029	Leak detection and leak repair requirements for pumps, valves, connectors, agitators, and instrumentation systems.
63.1024(f)	Record keeping for leak repair.
63.1035	General pump quality assurance program requirements.
63.1022(a)	Equipment identification
63.1022(b)	Additional equipment identification. In addition to 63.1022(a), equipment subject to 63.1023 through 63.1034 shall be specifically identified as required in paragraphs (b)(1) through (b)(5), as applicable.
63.1022(f)	Special equipment designations for equipment in heavy liquid service.
63.1029(b)	Leak detection monitoring method and instrument reading that defines a leak.
63.1029(c)	Leak repair
63.1033(b)	Open-ended valve or line equipment and operational standards.
63.1033(c)	Exemption for open-ended valves or lines during an emergency shutdown.
63.1033(d)	Open-ended valves or lines exemption for polymerizing materials.
63.1038(a)	Recordkeeping system requirements.
63.1038(b)	General equipment leak records.

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

e) Reporting Requirements

- (1) The permittee shall notify the Toledo Division of Environmental Services (TES) in writing of any daily record showing that the condenser water wash system was not in service

when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TES within 30 days after the event occurs.

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

- (2) The permittee shall submit semiannual reports and other such notifications and reports for the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required when the alarm system indicates the pressure differential has dropped below 35 psia.

The semiannual reports shall be submitted each year by January 31 (covering July to December) and July 31 (covering January to June), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

- (3) The permittee shall submit reports and other such notifications and reports via the air services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections. Per 40 CFR 63.1410, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU (except 63.1030), including the following sections:

63.1417(f)	Periodic reports as specified in 40 CFR 63.1417(f)(1) shall be submitted. In addition, for equipment leaks subject to 40 CFR 63.1410, the permittee shall submit the information specified in 40 CFR Part 63, Subpart UU.
63.1417(f)(1)	Semiannual reports containing the information in 40 CFR 63.1417(f)(2), or 63.1417(f)(3) through (f)(12) shall be submitted.
63.1417(f)(2)	If none of the compliance exceptions specified in 40 CFR 63.1417(f)(3) through (f)(11) occurred during the semiannual period, then a statement that the affected source was in compliance for the preceding 6-month period and no activities in paragraphs 63.1417(f)(3) through (f)(11) occurred during the previous 6-month period.
63.1417(f)(3)	Semi-annual reports shall identify any exceedances of the maximum allowable daily average reactor continuous process vent condenser exit temperature. In addition, records specifying any other periods of process or control technology operation when the condenser exit temperature monitoring device was not operating.
63.1417(f)(4)	Notification if one or more emission point(s) or

	amino/phenolic resin processing units is added.
63.1417(f)(5)	Reporting requirements if there is a deviation from the mass emission limitation specified in 40 CFR 63.1405(a)(3).
63.1417(f)(6)	Reporting requirement if there is a change to a primary product determination for amino-phenolic resins made under 40 CFR 63.1400(g).
63.1417(f)(7)	The report shall include the results for each change made to a primary product determination under 40 CFR 63.1400(g).
63.1417(f)(10)	Notification if electing to comply with reduced recordkeeping program under 63.1416(h).
63.1417(f)(11)	Notification that the permittee has elected to not retain the daily average, batch cycle daily average, or block average values, as appropriate, as specified in 63.1416(h)(2)(i).
63.1417(g)	Reports of malfunctions.
63.1417(h)	Notification of changes to primary product, report of notification of addition of amino/phenolic resin processing unit emission points, and change from small to large control device.
63.1039	The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039, as applicable.

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

f) Testing Requirements

(1) Compliance with the emission limitations in b) shall be determined in accordance with the following methods:

a. Emission Limitation:

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



Effective Date: To be entered upon final issuance

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

3.2 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

Reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

Reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

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

63.1414(a)	test methods for conducting performance tests
63.1414(d)	determining uncontrolled organic HAP emissions

g) Miscellaneous Requirements

- (1) None.



5. P012, Reactor #5

Operations, Property and/or Equipment Description:

Reactor Used To Produce Liquid Resin

- 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
amino/phenolic resin processing unit, general provisions		
a.	40 CFR 63, Subpart A (40 CFR 63.01-15)	Table 1 to Subpart OOO of 40 CFR Part 63 – Applicability of General provisions to Subpart OOO shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
b.	40 CFR 63, Subpart OOO (40 CFR 63.1400–1419) [In accordance with 40 CFR 63.1400(a), this emissions unit is an amino/phenolic resin process unit existing affected source located at a major source for hazardous air pollutants (HAPs).]	The provisions of this subpart, except as allowed under 63.1403(b), apply to the owner or operator of an affected source who shall comply with the provisions of §§63.1404 through 63.1410, as appropriate. When emissions are vented to a control device or control technology as part of complying with this subpart, emissions shall be vented through a closed vent system meeting the requirements of 40 CFR part 63, subpart SS (national emission standards for closed vent systems, control devices, recovery devices). [63.1403(a)] see b)(2)a.
Reactor continuous process vent controlled by a condenser with spray wash system		
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)(1)	5.9 lbs/hr of particulate emissions
e.	40 CFR 63, Subpart OOO (40 CFR 63.1406(a)(2), (a)(2)(ii) or (iii))	See b)(2)b. and b)(2)c.
heat exchange systems		
f.	40 CFR 63, Subpart OOO (40 CFR 63.1409(a)(1))	Exemption from the leak detection and repair requirements for existing heat exchange systems (cooling coils) operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.
equipment leaks, controlled by equipment design and operating and maintenance programs		
g.	40 CFR 63, Subpart OOO (40 CFR 63.1410) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.]	See b)(2)d. and b)(2)e.
pressure relief devices		
h.	40 CFR 63, Subpart OOO (40 CFR 63.1411) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pressure relief devices in organic HAP service.]	The permittee has indicated that there are no pressure relief devices in organic HAP service.
storage vessels		
i.	40 CFR 63, Subpart OOO (40 CFR 63.1404(a)) [In accordance with 40 CFR 63.1404(a), these requirements apply to storage vessels with a capacity of: greater than or equal to 20,000 gallons, but less than 40,000 gallons and vapor pressure of 1.9 pounds per square inch absolute (psia); greater than or equal to 40,000 gallons, but less than 90,000	There are no applicable requirements for existing storage vessels with a capacity of less than 20,000 gallons. The permittee has indicated that all storage vessels have a capacity of less than 20,000 gallons.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	gallons, and a vapor pressure of 0.75 psia or greater; or has a capacity of 90,000 gallons or greater and vapor pressure of 0.15 psia or greater.]	

(2) Additional Terms and Conditions

a. Applicability 63.1400(k)

- i. The emissions limitations set forth in 40 CFR Part 63, Subpart OOO apply at all times, except during periods of non-operation of the affected source (or specific portion thereof) resulting in cessation of the emissions to which this subpart applies.
- ii. The emission limitations set forth in 40 CFR part 63, subpart UU, as referred to in § 63.1410, shall apply at all times except during periods of non-operation of the affected source (or specific portion thereof) in which the lines are drained and depressurized resulting in cessation of the emissions to which § 63.1410 applies.
- iii. The owner or operator shall not shut down items of equipment that are required or utilized for compliance with this subpart during times when emissions are being routed to such items of equipment if the shutdown would contravene requirements of this subpart applicable to such items of equipment.
- iv. At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

b. Except as otherwise provided in 40 CFR 63.1406, the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

- i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

- ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.
- c. As an alternative to complying with the limitations of 40 CFR 63.1406(a), the permittee may vent all organic HAP emissions from the reactor batch process vent to a non-combustion control device achieving an outlet organic HAP concentration of 50 ppmv or less.
- d. Except as otherwise provided in 40 CFR Part 63, Subpart OOO, the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU. These requirements are described in 40 CFR 63.1029 and 63.1410.
- e. The Notification of Compliance Status report submitted 6/18/2003 indicates that the permittee is subject to the requirements in 40 CFR Part 63, Subpart UU for equipment in heavy liquid service, and indicates that there is no equipment in gas or light liquid service.

c) Operational Restrictions

- (1) The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

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

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections. Per 40 CFR 63.1410, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU (except 63.1030), including the following sections:

63.1409(a)	Exempt from heat exchanger leak detection and repair requirements, provided that the minimum pressure on the cooling water side is maintained at least 35 kilopascals (5.08 psi) greater than the maximum pressure on the process side.
63.1410	The permittee shall comply with 40 CFR Part 63, Subpart UU (except 63.1030) for all equipment, as defined under 40 CFR 63.1402, that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more.
63.1411(c)	Except as specified in 63.1411(d), emissions of organic HAP to the atmosphere from pressure relief devices in organic HAP service are prohibited.
63.1413(a)	Establishment of parameter monitoring levels for the reactor batch process vent condenser based on a design evaluation or performance test, in compliance with the

	requirements of 40 CFR 63.1413 for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO, these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in b)(1)g.
63.1022	Requirements of 40 CFR Part 63, Subpart UU from all equipment, as defined under 40 CFR 63.1402, that contains or contacts 5 weight percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.
63.1024(a)	Repair of leaking equipment.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall (a) maintain and operate and (b) record daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

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

- (2) The permittee shall maintain daily records of a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum.

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

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections. Per 40 CFR 63.1410, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU (except 63.1030), including the following sections:

63.1413(a)	Requirement to establish parameter monitoring levels of the reactor batch process vent condenser.
63.1415(a), (a)(1), (b)(3)	The maintenance and operation of a reactor batch process vent condenser exit temperature monitoring device equipped with a continuous recorder is required.
63.1416(a)	Data retention requirements.
63.1416(b)	Malfunction records. Record the number of failures to meet an applicable standard, and for each failure, record the date, time, and duration of each failure. For each failure to meet an

	applicable standard, record and maintain a list of affected sources or equipment, an estimate of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions. Record actions taken to minimize emissions in accordance with 63.14200(h)(4), and any corrective actions taken to return the affected unit to its normal or usual manner of operation.
63.1416(c)	Maintain continuous records of reactor batch process vent condenser exit temperature as specified in 63.1416(c)(1) through (c)(6).
63.1416(d)	Record keeping for batch process vent.
63.1416(g)	Maintain records of continuous monitoring system calibration checks and records documenting maintenance.
63.1416(h)	Reduced recordkeeping program requirements.
63.1029	Leak detection and leak repair requirements for pumps, valves, connectors, agitators, pressure relief devices, and instrumentation systems.
63.1024(f)	Record keeping for leak repair.
63.1035	General pump quality assurance program requirements.
63.1022(a)	Equipment identification
63.1022(b)	Additional equipment identification. In addition to 63.1022(a), equipment subject to 63.1023 through 63.1034 shall be specifically identified as required in paragraphs (b)(1) through (b)(5), as applicable. This paragraph does not apply to a batch product process where the permittee elects to pressure test the batch product process equipment train pursuant to 63.1036.
63.1022(f)	Special equipment designations for equipment in heavy liquid service.
63.1029(b)	Leak detection monitoring method and instrument reading that defines a leak.
63.1029(c)	Leak repair
63.1033(b)	Open-ended valve or line equipment and operational standards.
63.1033(c)	Exemption for open-ended valves or lines during an emergency shutdown.
63.1033(d)	Open-ended valves or lines exemption for polymerizing materials.
63.1038(a)	Recordkeeping system requirements.
63.1038(b)	General equipment leak records.

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

e) Reporting Requirements

- (1) The permittee shall notify the Toledo Division of Environmental Services (TES) in writing of any daily record showing that the condenser water wash system was not in service

when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TES within 30 days after the event occurs.

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

- (2) The permittee shall submit semiannual reports and other such notifications and reports for the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required when the alarm system indicates the pressure differential has dropped below 35 psia.

The semiannual reports shall be submitted each year by January 31 (covering July to December) and July 31 (covering January to June), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

- (3) The permittee shall submit reports and other such notifications and reports via the air services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections. Per 40 CFR 63.1410, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU (except 63.1030), including the following sections:

63.1417(f)	Periodic reports as specified in 40 CFR 63.1417(f)(1) shall be submitted. In addition, for equipment leaks subject to 40 CFR 63.1410, the permittee shall submit the information specified in 40 CFR Part 63, Subpart UU.
63.1417(f)(1)	Semiannual reports containing the information in 40 CFR 63.1417(f)(2), or 63.1417(f)(3) through (f)(12) shall be submitted.
63.1417(f)(2)	If none of the compliance exceptions specified in 40 CFR 63.1417(f)(3) through (f)(11) occurred during the semiannual period, then a statement that the affected source was in compliance for the preceding 6-month period and no activities in paragraphs 63.1417(f)(3) through (f)(11) occurred during the previous 6-month period.
63.1417(f)(3)	Semi-annual reports shall identify any exceedances of the maximum allowable daily average reactor batch process vent condenser exit temperature, and when applicable, the information required under 40 CFR 63.1416(d)(3)(ii) specifying the times and duration of periods of monitoring system breakdowns, repairs, and calibration checks. In addition, records specifying any other periods of process or control technology operation when the condenser

	exit temperature monitoring device was not operating.
63.1417(f)(4)	Notification if one or more emission point(s) or amino/phenolic resin processing units is added.
63.1417(f)(5)	Reporting requirements if there is a deviation from the mass emission limitation specified in 40 CFR 63.1406(a)(2)(iii).
63.1417(f)(6)	Reporting requirement if there is a change to a primary product determination for amino-phenolic resins made under 40 CFR 63.1400(g).
63.1417(f)(7)	The report shall include the results for each change made to a primary product determination under 40 CFR 63.1400(g).
63.1417(f)(10)	Notification if electing to comply with reduced recordkeeping program under 63.1416(h).
63.1417(f)(11)	Notification that the permittee has elected to not retain the daily average, batch cycle daily average, or block average values, as appropriate, as specified in 63.1416(h)(2)(i).
63.1417(g)	Reports of malfunctions.
63.1417(h)	Notification of changes to primary product, report of notification of addition of amino/phenolic resin processing unit emission points, and change from small to large control device.
63.1039	The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039, as applicable.

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

f) Testing Requirements

(1) Compliance with the emission limitations in b) shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:



Effective Date: To be entered upon final issuance

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

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

5.9 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

Reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

Reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

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

63.1414(a)	test methods for conducting performance tests
63.1414(d)	determining uncontrolled organic HAP emissions

g) Miscellaneous Requirements

- (1) None.