



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

7/27/2016

Certified Mail

Mr. Kevin Cherney
Emerald Performance Materials, LLC
240 West Emerling Avenue
Akron, OH 44301-1600

Facility ID: 1677010029
Permit Number: P0113378
County: Summit

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 4/28/2016. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins".

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

Cc: Akron Regional Air Quality Management District



Response to Comments

Facility ID:	1677010029
Facility Name:	Emerald Performance Materials, LLC
Facility Description:	Industrial Organic Chemicals
Facility Address:	240 West Emerling Avenue Akron, OH 44301-1600 Summit County
Permit:	P0113378, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Akron Beacon Journal on 05/04/2016. The comment period ended on 06/03/2016.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: General

- a. Comment: Emerald is requesting that this Title V permit be split into separate Title V permits to help facilitate the sale of a portion of the assets. Emission units P020, P026, T041, T042, T043, T044, T045, T046 and T047, should be included in the Emerald Performance Materials, LLC Title V permit and the remaining insignificant and significant emissions units should be included into a new Title V permit associated with a subsidiary or subsidiaries to be determined. Please let us know what we need to do to help you facilitate this change.

Response: The permit cannot be split at this stage. Once the assets are sold, you will need to work with Ohio EPA, Central Office, Division of Air Pollution Control.

2. Topic: Facility-Wide Terms and Conditions

- a. Comment: B.3.- Please add the newly installed RLP Emergency Generator (P026) to the list of insignificant emissions units associated with the Emerald Title V permit. This emission unit is exempt from permitting pursuant to Ohio EPA's Permit-by-Rule Exemption.



Response: This emissions unit has been added to the preliminary proposed Title V permit.

- b. Comment: B.-Please correct the paragraph numbering error throughout this section.

Response: This numbering error has been corrected.

3. Topic: B001, Gas Boiler #1

- a. Comment: C.1.b)(1)d.-
This boiler is exempt from Subpart DDDDD because it is a control device for P007. Does this boiler qualify for the control device exemption in OAC rule 3745-110-03(K)(14)? If so, Emerald would prefer this exemption over the (K)(21) capacity factor exemption. This boiler may operate on rare occasions when P007 is not in operation.

Response: If you choose the exemption under OAC rule 3745-110-03(K)(4), this only applies when the boiler is used as a control device. When the boiler is not used as a control device, the boiler would then need to comply with OAC rule 3745-110-03(B) and do a stack test to show compliance with this emission limitation.

- b. Comment: C.1.d)(2)-
Delete this section if Ohio EPA agrees that B001 qualifies for the control device exemption under OAC rule 3745-110-03(K)(14). See Comment #4.

Response: See response to "3.a" above.

- c. Comment: C.1.e)(2)-
Delete this section if Ohio EPA agrees that B001 qualifies for the control device exemption under OAC rule 3745-110-03(K)(14). See Comment #4.

Response: See response to "3.a" above.

4. Topic: B008, Coal Fired Boiler

- a. Comment: C.2.b)(1)d.-
This boiler is exempt from Subpart DDDDD because it is a control device for P007. Does this boiler qualify for the control device exemption in OAC rule 3745-110-03(K)(14)? If so, please delete this requirement. This boiler may operate on rare occasions when P007 is not in operation.

Response: Emissions Unit Term and Condition C.2.b)(1)e. exempts this emissions unit from OAC rule 3745-110-03(A)-(G) when being used as an air pollution control device. When this emissions unit is not used as an air pollution control device, it must meet the emission limitation in OAC rule 3745-110-03(B) as stated in Emissions Unit Term and Conditions C.2.b)(1)d.

- b. Comment: C.2.b)(2)c.- Delete this section.
Emerald does not agree that this emissions unit must conduct a New Source Review (NSR) applicability determination if this emission unit remains shutdown for longer than 2 years.
Emerald acknowledges that this emission unit does not meet the requirements of Subpart DDDDD and as such will not restart this boiler until this boiler is in compliance with Subpart DDDDD and all other state and federal regulations.



This emissions unit will likely never be run again but that decision will be made by the new owner.

Response: If this emissions unit is to recommence operation after being idle for more than 2 years, a NSR applicability determination will need to be done. This term and condition will not be removed.

- c. Comment: C.2.f)(4)d.-
Delete this section if Ohio EPA agrees that B008 qualifies for the control device exemption under OAC rule 3745-110-03(K)(14). See Comment #7. If
Ohio EPA disagrees that B008 does not qualify for the control device exemption, then replace "0.10 pound per MMBtu when burning natural gas" with "0.30 pound per MMBtu when burning coal".

Response: The term and condition C.2.f)(4)d. has been updated to state "0.30 pound per MMBtu when burning coal".

5. Topic: B014, 90.67 MMBtu/hr NG Boiler

- a. Comment: C.3.b)(1)g.- This boiler is exempt from
Subpart DDDDD because it is a control device for P007. Does this boiler qualify for the control device exemption in OAC rule 3745-110-03(K)(14)? If so, please delete this requirement. This boiler may operate on rare occasions when P007 is not in operation.

Response: When the emissions unit B014 is not operating as a control device, the emissions unit is required to meet the emission limitation established in OAC rule 3745-110-03(B). The OAC rule 3745-110-03(K)(14) exemption is cited for the emissions unit when it is operating as a control device under Emissions Unit Term and Condition C.3.b)(1)h. Additionally, this emissions unit was stack tested on May 19, 2015 and showed compliance with the OAC rule 3745-110-03(B) emission limitation.

6. Topic: F004, Ash Handling

- a. Comment: C.4.b)(2)g.- Delete this section.
Emerald does not agree that this emissions unit must conduct a New Source Review (NSR) applicability determination if this emissions unit remains shutdown for longer than 2 years.
Emerald acknowledges that B008 does not meet the requirements of Subpart DDDDD and as such will not restart B008 until this boiler is in compliance with Subpart DDDDD and all other state and federal regulations. B008 and therefore F004 will likely never be run again but that decision will be made by the new owner.

Response: If this emissions unit is to recommence operation after being idle for more than 2 years, a NSR applicability determination will need to be done. This term and condition will not be removed.

7. Topic: P003, Superlite

- a. Comment: C.6.g)(1)- Delete this section because it is for informational purposes only.
Ohio EPA is delegated authority for Subpart FFFF.

Response: Emissions Unit Term and Condition C.6.g)(1) has been removed.



8. Topic: P006, ARD

- a. Comment: C.7-
Renamethisprocess“ResinDProcess”.Removeallreferencesto“ARD”and“Agerite”.

Response: Any references to “ARD” and “Agerite” have been removed from Emissions Unit Term and Condition C.7. Additionally, the facility profile was updated to remove the references to “ARD” and “Agerite”.

- b. Comment: C.7.g)(1)-Deletethissectionbecauseitisforinformationalpurposesonly.
OhioEPAisdelegatedauthorityforSubpartFFFF.

Response: Emissions Unit Term and Condition C.7.g)(1) has been removed.

9. Topic: P007, Hycar

- a. Comment: C.8-Renamethisprocess“Latex”.Removeallreferencesto“Hycar”.

Response: Any reference to “Hycar” has been removed from Emissions Unit Term and Condition C.8. Additionally, the facility profile was updated to remove any references to “Hycar”.

- b. Comment: C.8.g)(1)-Deletethissectionbecauseitisforinformationalpurposesonly.
OhioEPAisdelegatedauthorityforSubpartU.

Response: Emissions Unit Term and Condition C.8.g)(1) has been removed.

10. Topic: P016, DPA A/O

- a. Comment: C.10.b)(2)f.-Replace“b)(2)(h)”with“b)(2)(g)”.

Response: In Emission Unit Term and Condition C.10.b)(2)f., the reference to b)(2)(h) was replaced with b)(2)(g).

- b. Comment: C.10.b)(2)g.-Replace“b)(2)(g)”with“b)(2)(f)”.

Response: In Emission Unit Term and Condition C.10.b)(2)g., the reference to b)(2)(g) was replaced with b)(2)(f).

- c. Comment: C.10.g)(1)-Deletethissectionbecauseitisforinformationalpurposesonly.
OhioEPAisdelegatedauthorityforSubpartFFFF.

Response: Emissions Unit Term and Condition C.10.g)(1) has been removed.

11. Topic: P020, RLP

- a. Comment: C.11.d)(1)-
Emeraldrecentlyinstalledanewthermaloxidizertocontrolthisemissionunit.However,theoriginalthermaloxidizerisstilloperationalandEmeraldwouldliketoretaintheabilitytousetheoriginalthermaloxidizerasabackuptocontrolthisemissionsunitwhilethebugsareshillbeingworkedoutonthanewthermaloxidizer.Emeraldanticipatesthisprocessmaytakeanotheryearorso.Therefore,Emeraldrequeststhatyoureplacethephrase“1566degreesFahrenheit”



Response to Comments
Emerald Performance Materials, LLC
Permit Number: P0113378
Facility ID: 1677010029

with "1566 degrees Fahrenheit for the new thermal oxidizer and 1379 degrees Fahrenheit for the old thermal oxidizer".

Response: The option of using the old or new thermal oxidizer has been added to the terms and conditions for emissions unit P020.



- b. Comment: C.11.g)(1)-Deletethissectionbecauseitisforinformationalpurposesonly.
OhioEPAisdelegatedauthorityforSubpartU.

Response: Emissions Unit Term and Condition C.11.g)(1) has been removed.

12. Topic: T041, T042, T043, T044 – Storage Tanks

- a. Comment: C.12-Replaceallreferencesto“P007”with“P020”.

Response: This will be done when the Title V permit is split.



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for Emerald Performance Materials, LLC

Facility ID:	1677010029
Permit Number:	P0113378
Permit Type:	Renewal
Issued:	7/27/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Emerald Performance Materials, LLC

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Preliminary Proposed Title V Permit

Emerald Performance Materials, LLC

Permit Number: P0113378

Facility ID: 1677010029

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1677010029
Facility Description: Industrial Organic Chemicals
Application Number(s): A0045596, A0047819, A0051617, A0053015, A0056289
Permit Number: P0113378
Permit Description: Title V Renewal Permit for two Natural Gas Fired Boilers (B001 and B014), a Coal Fired Boiler (B008), Ash Handling (F003), Solid Superlite Process (P002), Superlite Process (P003), Resin D Process (P006), Synthetic Rubber Latex Manufacturing (P007), DEPA Process (P012), DPA A/O Process (P016), Reactive Liquid Polymers Process (P020), four storage tanks (T041-T044) and several insignificant emissions unit.
Permit Type: Renewal
Issue Date: 7/27/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0102593

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

Emerald Performance Materials, LLC
240 West Emerling Avenue
Akron, OH 44301-1600

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

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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 Akron Regional Air Quality Management District. 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



Preliminary Proposed Title V Permit
Emerald Performance Materials, LLC
Permit Number: P0113378
Facility ID: 1677010029
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District) 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.
- 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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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.



Preliminary Proposed Title V Permit

Emerald Performance Materials, LLC

Permit Number: P0113378

Facility ID: 1677010029

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 Akron Regional Air Quality Management District, 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.



Preliminary Proposed Title V Permit

Emerald Performance Materials, LLC

Permit Number: P0113378

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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. This facility is subject to 40 CFR Part 68 (112(r) of the Clean Air Act).
3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
B010	115 Kilowatt Detroit Model 53L-67 Electric Generator
B012	170 Horsepower Detroit Model PTA-1SD-50 Firefighting Water Pump
B013	325 Horsepower Cummins Model NT855-F2 Firefighting Water Pump
P026	60 Horsepower Natural Gas Fired Emergency Electric Generator
T020	36,000 gallon fixed roof storage tank - Aniline #3
T022	13,000 gallon fixed roof pressurized storage tank - Isobutylene #35 aka #37
T031	19,100 gallon fixed roof storage tank (NEPA, aka #46) - Vanlube #17
T032	24,100 gallon fixed roof storage tank (Stalite, aka #47) - Vanlube #18
T033	29,000 gallon horizontal cylindrical storage tank - Propylene Trimer #13 (aka #48)
T034	23,300 gallon horizontal cylindrical storage tank (NEPA, aka #49) - Vanlube #19
T036	23,300 gallon horizontal cylindrical storage tank - Stalite #21 (aka #51)
T037	5,000 gallon fixed roof storage tank - Superlite #52
T039	11,300 gallon fixed roof storage tank - Vanlube #55
T040	45,000 gallon fixed roof storage tank (Vanlube SL-HP (Stalite)) - Vanlube #56
T045	26,000 gallon pressurized fixed roof storage tank - Butadiene #64
T046	26,000 gallon pressurized fixed roof storage tank - Butadiene #65
T047	16,000 gallon pressurized fixed roof storage tank - Recovered Butadiene #66
T071	26,844 gallon horizontal cylindrical storage tank - Recovered Aniline TK4
T077	13,450 gallon vertical cylindrical storage tank - Triisobutylene Storage Tank TK9
T079	16,150 gallon Styrene Storage Tank TK8
T082	28,975 gallon horizontal cylindrical storage tank - DPA Storage Tank TK16
T083	13,750 gallon vertical cylindrical storage tank - Propylene Trimer Storage Tank TK12
T084	28,975 gallon horizontal cylindrical storage tank - Diisobutylene Storage Tank TK15
T085	21,500 gallon horizontal storage tank 3190 NT - Tk #24

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

4. The following emissions units contained in this permit are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group I Polymers and Resins, 40 CFR Part 63, Subpart U: P007, P020, T041, T042, T043 and T044. The complete NESHAP requirements, including the 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 Akron Regional Air Quality Management District (ARAQMD).



- 5. The following emissions units contained in this permit are subject to NESHAP for Miscellaneous Organic Chemical Manufacturing, 40 CFR Part 63, Subpart FFFF: P003, P006, P016, T020, T031, T032, T034, T036, T037, T039, T040, T079 and T082. The complete NESHAP requirements, including the 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 ARAQMD.
- 6. The following emissions units contained in this permit are subject to NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ: B010, B012 and B013. The complete NESHAP requirements, including the 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 ARAQMD.
- 7. The permittee shall comply with the applicable emission limitations and other requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections and tables:

<u>Section/Table:</u>	<u>Requirement:</u>
63.6602	You must comply with the emission limitations and other requirements in Table 2c to this subpart which apply to you.
Table 2c	<p>You must meet the following requirement, except during periods of startup:</p> <ul style="list-style-type: none"> a. change oil and filter every 500 hours of operation or annually, whichever comes first; b. inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. <p>If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of this subpart, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.</p> <p>During periods of startup you must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.</p>
63.6640(a)	You must demonstrate continuous compliance according to methods specified in Table 6 to this subpart.
Table 6	<p>You must demonstrate continuous compliance by:</p> <ul style="list-style-type: none"> a. Operating and maintaining the stationary RICE according to the



manufacturer's emission-related operation and maintenance instructions; or

- b. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

63.6640(d) For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR 94.11(a).

- 8. The permittee shall comply with the applicable general requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.6605(a)	You must be in compliance with the emission limitations, operating limitations, and other requirements in 40 CFR Part 63, Subpart ZZZZ that apply to you at all times.
63.6605(b)	At all times you 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 you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used 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.

- 9. The permittee shall comply with the applicable installation, collection, operation, maintenance, monitoring and recordkeeping requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.6625(e)	You must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
63.6625(f)	You must install a non-resettable hour meter if one is not already installed.
63.6625(h)	You must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.
63.6625(i)	You have the option of utilizing an oil analysis program in order to extend the

specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

- 63.6640(f) You must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of §63.6640. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of §63.6640, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of §63.6640, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.
- 63.6655(a) You must keep the records described in paragraphs (a)(1) through (a)(5) of §63.6655.
- 63.6655(d) You must keep the records required in Table 6 of 40 CFR Part 63, Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to you.
- 63.6655(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.
- 63.6655(f) You must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.
- 63.6660(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).
- 63.6660(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or



record.

63.6660(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

10. The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections and tables:

<u>Section/Table:</u>	<u>Requirement:</u>
63.6640(b)	You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in 40 CFR Part 63, Subpart ZZZZ. These deviations must be reported according to the requirements in §63.6650.
63.6640(e)	You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you.
63.6650(a)	You must submit each report in Table 7 of 40 CFR Part 63, Subpart U that applies to you.
Table 7	Requirements for Reports
63.6650(f)	Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in 40 CFR Part 63, Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of 40 CFR Part 63, Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in 40 CFR Part 63, Subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.

11. The permittee shall comply with the applicable general and miscellaneous requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections and table:

<u>Section/Table:</u>	<u>Requirement:</u>
63.6595	You must comply with the applicable emission limitations, operating limitations, and other requirements no later than May 3, 2013
63.6665	Table 8 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.
Table 8	Applicability of General Provisions to Subpart ZZZZ
63.6670	Who implements and enforces 40 CFR Part 63, Subpart ZZZZ?



63.6675 Definitions that apply to 40 CFR Part 63, Subpart ZZZZ

12. The following emissions units contained in this permit are subject to NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD: B003, B004 and B009. The complete NESHAP requirements, including the 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 ARAQMD.

13. You must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, except as provided in §63.6(i) of 40 CFR Part 63, Subpart A.

14. The permittee shall comply with the emission limitations, work practice standards and operating limits required under 40 CFR Part 63, Subpart DDDDD, including the following sections and table:

<u>Section/Table:</u>	<u>Requirement:</u>
63.7500(a)	You must meet the requirements in paragraphs (a)(1) through (3) of this section, except as provided in paragraphs (b) through (e) of this section. You must meet these requirements at all times the affected unit is operating, except as provided in paragraph (f) of this section.
63.7500(a)(1)	You must meet each emission limitation and work practice standard in Tables 1 through 3 and 11 through 13 that applies to your boiler or process heater
Table 3	Work Practice Standards
63.7500(a)(3)	At all times, you must operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions.
63.7500(e)	Boilers and process heaters must complete a tune-up every 5 years as specified in §63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4.
63.7505(a)	You must be in compliance with the emission limits, work practice standards, and operating limits in 40 CFR Part 63, Subpart DDDDD. These limits apply to you at all times the affected unit is operating except for the periods noted in §63.7500(f).

15. The permittee shall comply with the initial compliance requirements and subsequent tune-ups required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.7510(e)	You must complete an initial tune-up by following the procedures described in §63.7540(a)(10)(i) through (vi) no later than the compliance date specified in §63.7495. You must complete the one-time energy assessment specified in Table 3 to this subpart no later than the compliance date specified in §63.7495.
63.7515(d)	You must conduct a 5-year performance tune-up according to §63.7540(a)(12). Each 5-year tune-up specified in §63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up.



16. The permittee shall comply with the applicable continuous compliance requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.7540(a)(12)	You must conduct a tune-up of the boiler or process heater every 5 years as specified in §63.7540(a)(10)(i) through (vi) to demonstrate continuous compliance. You may delay the burner inspection specified in §63.7540(a)(10)(i) until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months.
63.7540(a)(13)	If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

17. The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.7540(a)(10)(vi)	Maintain on-site and submit, if requested by the Administrator, an annual report containing the information in paragraphs (a)(10)(vi)(A) through (C) of §63.7540.
63.7555(a)	You must keep records according to paragraphs (a)(1) and (2) of §63.7555.
63.7555(h)	You must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies.
63.7560(a)	Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1).
63.7560(b)	As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.7560(c)	You must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records off site for the remaining 3 years.

18. The permittee shall comply with the applicable notification and reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections and table:

<u>Section/Table:</u>	<u>Requirement:</u>
63.7495(d)	You must meet the notification requirements in §63.7545 according to the schedule in §63.7545 and in subpart A of 40 CFR Part 63. Some of the notifications must be submitted before you are required to comply with the emission limits and work practice standards in 40 CFR Part 63, Subpart DDDDD.
63.7530(e)	You must include with the Notification of Compliance Status a signed certification that the energy assessment was completed according to Table 3 and is an accurate depiction of your facility at the time of the assessment.



- 63.7530(f) You must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in §63.7545(e).
 - 63.7545(a) You must submit to the Administrator all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified.
 - 63.7545(b) You must submit an Initial Notification not later than May 31, 2013.
 - 63.7545(e) You must submit a Notification of Compliance Status according to §63.9(h)(2)(ii).
 - 63.7545(f) You must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in §63.7575.
 - 63.7545(h) You must provide notice of the date upon which you switched fuels or made the physical change within 30 days of the switch/change.
 - 63.7550(a) You must submit each report in Table 9 to this subpart that applies to you.
 - Table 9 You must comply with the following requirements for reports.
 - 63.7550(b) For units that are subject only to a requirement to conduct subsequent annual, biennial, or 5-year tune-up according to §63.7540(a)(10), (11), or (12), respectively, and not subject to emission limits or Table 4 operating limits, you may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of §63.7550(b), instead of a semi-annual compliance report.
 - 63.7550(h) You must submit the reports according to the procedures specified §63.7550(h)(1) through (3).
19. The permittee shall comply with the applicable miscellaneous requirements and information required under 40 CFR Part 63, Subpart DDDDD, including the following sections and table:
- | <u>Section/Table:</u> | <u>Requirement:</u> |
|-----------------------|--|
| 63.7565 | Table 10 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you. |
| Table 10 | Applicability of General Provisions to Subpart DDDDD |
| 63.7570 | Who implements and enforces 40 CFR Part 63, Subpart DDDDD? |
| 63.7575 | Definitions that apply to 40 CFR Part 63, Subpart DDDDD |
20. The following emissions unit contained in this permit is subject to New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ: P026. The complete requirements, including general provisions may be accessed via the internet from the electronic code of federal regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting ARAQMD.
21. The permittee shall comply with the applicable emission standards and compliance requirements under 40 CFR Part 60, Subpart JJJJ, including the following sections and tables:
- | <u>Section/Table:</u> | <u>Requirement:</u> |
|-----------------------|---------------------|
|-----------------------|---------------------|



60.4233(d) Owner or operator must comply with the emission standards in Table 1 to this subpart for their emergency stationary spark ignition internal combustion engine (SI ICE).

Table 1 NO_x, CO and VOC Emission Standards

60.4234 Owners and Operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine.

22. The permittee shall comply with the applicable compliance, monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart JJJJ, including the following sections:

Section: Requirement:

60.4237(c) You must install a non-resettable hour meter upon startup of your emergency engine.

60.4243(b)(1) You must demonstrate compliance by purchasing an engine certified according to the procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section.

60.4243(a)(1) If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR Part 1068, Subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance.

60.4243(b)(2) If you do not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance according to (a)(2)(i) through (iii) of this section, as appropriate.

60.4243(b)(2)(i) If you are an owner or operator of a stationary SI internal combustion engine less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions, but no performance testing is required if you are an owner or operator.

60.4243(d) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (d)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (d)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (d)(1) through (3) of this section, the



engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

60.4243(f) If you do not operate and maintain your certified stationary SI internal combustion engine and control device according to the manufacturer's written emission-related instructions, you are required to perform initial performance testing as indicated in this section, but you are not required to conduct subsequent performance testing unless the stationary engine is rebuilt or undergoes major repair or maintenance. A rebuilt stationary SI ICE means an engine that has been rebuilt as that term is defined in 40 CFR 94.11(a).

60.4243(g) It is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

60.4245(a) Owners and operators of all stationary SI ICE must keep records of the information in paragraphs (1) through (4) below:

(1) All notifications submitted to comply with this subpart and all documentation supporting any notification.

(2) Maintenance conducted on the engine.

(3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(4) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards.

60.4245(b) The owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

60.4245(d) Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed.

23. If required, the permittee shall comply with the testing requirements under 40 CFR Part 60, Subpart JJJJ, including the following section:

Section: Requirement:

60.4244

Test methods and other procedures I must use if I am an owner or operator of a stationary SI internal combustion engine.



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Emerald Performance Materials, LLC
Permit Number: P0113378
Facility ID: 1677010029
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. B001, Gas Boiler #1

Operations, Property and/or Equipment Description:

93 MM Btu/hr Henry Vogt Machine Company natural gas fired boiler #1 - Gas Boiler #1

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)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(B)(1)	The maximum allowable amount of PE for shall be 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-18-06(A)	This emissions unit is exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
d.	OAC rule 3745-110-03(K)(21)	The requirements of paragraphs (A) to (G) of OAC rule 3745-110-03 shall not apply to any affected source whose utilization is less than ten per cent of its capacity factor on an annual average basis over a three-year rolling period and less than twenty per cent of its capacity factor in any year of the three-year rolling period.
e.	40 CFR Part 63, Subpart DDDDD	Exempt per §63.7491(h) of 40 CFR Part 63, Subpart DDDDD since this boiler is used as a control device for emissions unit P007 to comply with Subpart U of 40 CFR Part 63.

- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) 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)(1)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)]

- (2) The permittee shall collect and record the following information each year:
 - a. The annual gross actual output or the annual actual heat input;
 - b. the annual capacity factor (i.e., either the ratio of the gross actual output to the gross rate output or the ratio of actual heat input to potential heat input); and
 - c. the annual capacity factor averaged over a three-year rolling period.

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



e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the 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 six-month periods.

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

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any annual record showing either the annual average capacity factor is equal to or greater than ten percent based on a three-year rolling period or the annual capacity factor is equal to or greater than twenty per cent in any year. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar year.

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

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

[Authority of Term: OAC rule 3745-15-03(A)]

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:

The maximum allowable amount of PE for shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be demonstrated using the PE factor of 1.9 pounds of PE per million standard cubic feet (scf) of natural gas fired divided by 1020 Btu/scf (AP-42, dated 7/98, Table 1.4-2).

If required, compliance with the allowable PE limitation above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]



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b. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A 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)]

g) Miscellaneous Requirements

(1) None.

2. B008, Coal Fired Boiler

Operations, Property and/or Equipment Description:

115 MM Btu/hr Babcock and Wilcox coal fired boiler - Coal Fired Boiler

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)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(C)	The PE shall not exceed 0.19 pound of PE per million Btu actual heat input.
c.	OAC rule 3745-18-83(H)	The permittee shall not cause or permit the emission of sulfur dioxide (SO ₂) from any stack at this facility in excess of 5.22 pounds of SO ₂ per million Btu actual heat input.
d.	OAC rule 3745-110-03(B)	When this emissions unit is not being employed as an air pollution control device for emissions unit P007, the emissions of NO _x shall not exceed 0.30 pound per MM Btu when burning coal only.
e.	OAC rule 3745-110-03(K)(14)	When this emissions unit is being employed as an air pollution control device for emissions unit P007, the requirements of paragraphs (A) to (G) of OAC rule 3745-110-03 shall not apply.
f.	40 CFR 52.1881(b)(10)(xx)	The SO ₂ emission limitation required by 40 CFR 52.1881(b)(10)(xx) is equivalent to the SO ₂ emission limitation specified in OAC rule 3745-18-83(H).
g.	40 CFR Part 64	See d)(4) through d)(7), e)(3), e)(4), and e)(6) through e)(8) below.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	40 CFR Part 63, Subpart DDDDD	Exempt per §63.7491(h) of 40 CFR Part 63, Subpart DDDDD since this boiler is used as a control device for emissions unit P007 to comply with Subpart U of 40 CFR Part 63.

(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.

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

- b. On December 14, 2014, this emissions unit ceased to operate.
- c. If this emissions unit remains shut down for more than 2 years, before it recommences operation, the permittee shall be required to comply with all federal and Ohio EPA new source review requirements and federal New Source Performance Standards that are applicable, if any, and demonstrate compliance with all applicable emission limitations and control requirements in the Title V permit by performing emission testing in accordance with the approved U.S. EPA methods and procedures. The permittee shall notify Akron Regional Air Quality Management District (ARAQMD) at least 60 days prior to recommencing operation of this emissions unit.

Before this emissions unit recommences operation, the permittee shall demonstrate, in accordance with U.S. EPA guidance,* whether or not the emissions unit is subject to any federal and Ohio EPA new source review requirements and any federal New Source Performance Standards. If the demonstration shows that the emissions unit is subject to federal and Ohio EPA new source review requirements and/or federal New Source Performance Standards due to recommencing operation, the emissions unit shall remain shut down until such time that the permittee applies for and obtains a permit to install for this emissions unit. After the permittee obtains the permit to install, the emissions unit shall be operated in accordance with the terms and conditions of the permit to install, and the existing terms and conditions of this Title V permit shall be modified to incorporate the requirements of the permit to install within 12 months after recommencing operation of this emissions unit.

If the emissions unit is not subject to any federal and Ohio EPA new source review requirements and federal New Source Performance Standards due to recommencing operation, the permittee may recommence operation of the emissions unit in accordance with the terms and conditions in this Title V permit.

Within 30 days after achieving maximum rated capacity, but no longer than 90 days after recommencing operation of this emissions unit, the permittee shall conduct or have conducted emission testing for the emissions unit, in accordance

with the approved U.S. EPA methods and procedures, to demonstrate compliance with all applicable emission limitations and control requirements in b) above as described in f) below. If the permittee, based on the results of the emission testing, fails to demonstrate compliance with all applicable emission limitations and control requirements in b) above, then the permittee shall shut down the emissions unit immediately, and submit a control plan and compliance schedule to the Director to bring the emissions unit into compliance with all applicable emission limitations and control requirements in b) of the Title V permit. The permittee shall not operate the emissions unit until the compliance strategy has been implemented. Further emission testing shall be performed within 2 months after achieving maximum rated capacity, but no longer than 90 days after recommencing operation to demonstrate compliance. If the initial emission testing demonstrates compliance with all applicable emission limitations and control requirements in b), the permittee may continue operation of the emissions unit in accordance with the terms and conditions in this Title V permit.

* EPA Memorandum from Edward E. Reich, Director of the Division of Stationary Source Enforcement, to Conrad Simon, Director of Air and Waste Management Division, Region II (July 9, 1982)

* EPA letter from William L. MacDowell, Chief of the regulation Development Section, Region V, to James H. Schlender, Executive Administrator, Great Lakes Indian Fish & Wildlife Commission (March 10, 1992)

* EPA Memorandum from Sandra S. Gardebring, Director, Division of Enforcement, to Edward E. Reich, Director, Division of Stationary Source Enforcement (September 22, 1980)

* EPA Memorandum from Edward E. Reich, Director of the Division of Stationary Source Enforcement, to Sandra S. Gardebring, Director, Division of Enforcement (Oct. 3, 1980)

* EPA Memorandum from John B. Rasnic, Stationary Source Compliance Division, Office of Air Quality Planning and Standards, to Douglas M. Skie, Chief, Air Program Branch (Nov. 19, 1991)

* EPA Memorandum from Edward E. Reich, Director of the Division of Stationary Source Enforcement, to Stephen A. Dvorkin, Chief, General Enforcement Branch, Region II (Sept. 6, 1978)

* EPA Memorandum from William K. Sawyer, Attorney, General Enforcement Branch, Region II, Edward E. Reich, Director of the Division of Stationary Source Enforcement (July 28, 1980)

* EPA Memorandum from Edward E. Reich, Director of the Division of Stationary Source Enforcement, to William K. Sawyer, Attorney, General Enforcement Branch, Region II (August 8, 1980)



* EPA Memorandum from John S. Seitz, Director, Stationary Source Compliance Division, Office of Air Quality Planning and Standards, to Howekamp, Director, Air Management Division, Region IX (May 27, 1987)

* In regard to Monroe Electric Generating Plant, Petition No. 6-99-2, at 9 (June 11, 1999)

c) Operational Restrictions

- (1) The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 14 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 5.22 pounds sulfur dioxide per million Btu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all shipments of coal during each calendar month.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) On December 14, 2014, this emissions unit ceased to operate. The permittee shall not have to perform the monitoring and/or record keeping in d)(2) through d)(9) below as long as this emissions unit is shut down. If this emissions unit recommences operation, then the permittee shall immediately comply with the monitoring and/or record keeping requirements in d)(2) through d)(9) below.
- (2) The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative,

equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

[Authority of term: OAC 3745-18-04(D) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.

[Authority for term: OAC rule 3745-18-04(I) and OAC rule 3745-77-07(C)(1)]

- (4) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for the baghouse controlling this emissions unit is operating a differential pressure gauge and performing visible emission evaluations of the baghouse exhaust stack using procedures similar to Method 22 of 40 CFR Part 60, Appendix A. The indicator is the pressure drop range and the presence of visible emissions. When the performance indicator is operating outside the indicator range, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in e)(3) and e)(5) below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan, or any approved revision of the Plan. In addition to periodic monitoring of the operating parameters, the permittee also has an annual inspection and maintenance program for the baghouse. Based on the results of the annual inspection and maintenance program, repairs to the baghouse shall be made as needed. If the current CAM indicator and/or the baghouse inspection and maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) 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 1.0 to 9.0 inches of water.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

- (6) 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(s) is/are 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;
- 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

- (7) 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 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 daily 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

- (8) The permittee shall perform an inspection of the baghouse on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit to check for bag deterioration, dry rot, loose or torn bags, fallen bags, etc. Representative bag samples from each compartment of the baghouse shall be taken and testing on the samples shall be performed to determine bag condition and remaining bag life as described in f)(3) below. The baghouse duct work shall be inspected for holes, rust, etc and the baghouse dampers shall be visual inspected. Repair and replacement of equipment shall be performed as determined by the inspection. The permittee shall also perform daily inspections of the pressure taps on the differential pressure gauge to check for plugging in accordance with the inspection and maintenance checklist.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

- (9) The permittee shall maintain a record of the results of each annual and daily inspection of the baghouse, as well as the results of the bag testing required in f)(3) below.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

e) Reporting Requirements

- (1) On December 14, 2014, this emissions unit ceased to operate. The permittee shall not have to submit the reports in e)(2) through e)(8) below as long as this emissions unit is shut down. If this emissions unit recommences operation, then the permittee shall immediately comply with the reporting requirements in e)(2) through e)(8) below.

- (2) The permittee shall submit quarterly reports on the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
- a. the total quantity of coal received (tons);
 - b. the average ash content (percent) of the coal received;
 - c. the average sulfur content (percent) of the coal received;
 - d. the average heat content (Btu/pound) of the coal received; and
 - e. the average sulfur dioxide emission rate (pounds sulfur dioxide per million Btu actual heat input) from the coal received.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate, using the results of the analyses of the monthly composite sample for sulfur content and heat content.

These quarterly reports shall be submitted by January 31, April 30, July 31 and October 31 of each year, unless otherwise specified by the appropriate Ohio EPA District Office or local air agency, and shall cover the data obtained during the previous calendar quarters.

[Authority for term: OAC rule 3745-18-04(I) and OAC rule 3745-77-07(C)(1)]

- (3) 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 was in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in “a” 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 “a” 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.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]



- (4) The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the pressure gauge for the baghouse is not operating properly. These reports shall include information required by 40 CFR Part 64.9(a). The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

- (5) 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(C)(1) and 40 CFR Part 64.9(a)]

- (6) The permittee shall submit annual reports that specify the results of each annual inspection of the baghouse, based on the records maintained pursuant to d)(9) above. These reports shall be submitted within 45 days after each inspection is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

- (7) The permittee shall submit reports that include the results of the bag testing required in f)(3) below. These reports shall be submitted within 45 days after each bag test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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

[Authority of Term: OAC rule 3745-15-03(A)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 90 days after recommencing operation of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and NOx.



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

For particulates - Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures and test methods specified in OAC rule 3745-17-03(B)(9).

For NOx – Methods 1 through 4 and 7, 7a, 7c, 7d or 7e of 40 CFR Part 60, Appendix A.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

- (2) On December 14, 2014, this emissions unit ceased to operate. The permittee shall not have to conduct testing in f)(3) below as long as this emissions unit is shut down. If this emissions unit recommences operation, then the permittee shall immediately comply with the testing requirements in f)(3) below.
- (3) The permittee shall conduct, or have conducted, bag testing using the bag samples collected during the annual inspection described in d)(8) above. An intent to test notification shall not be required for the testing noted in this term. The testing shall include a determination of the bag life and the bag condition. The procedures for the bag testing shall be in accordance with the manufacturer's recommendations.

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



(4) 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 PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A 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:

The PE shall not exceed 0.19 pound of PE per million Btu actual heat input.

Applicable Compliance Methods:

Compliance with the allowable particulate emission limitation shall be determined by using Methods 1-5 of 40 CFR Part 60, Appendix A and the procedures and test methods specified in OAC rule 3745-17-03(B)(9) as required in f)(1) above.

[Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

5.22 pounds of SO₂ per million Btu actual heat input

Applicable Compliance Method:

Compliance with the allowable SO₂ emission limitation shall be determined by using the fuel analysis records required pursuant to d)(2) and d)(3) above and the applicable equation in OAC rule 3745-18-04(F).

If required, compliance with the allowable SO₂ emission limitation above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-18-04(D).

[Authority for term: OAC rule 3745-18-04(D), OAC rule 3745-18-04(F), and OAC rule 3745-77-07(C)(1)]



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d. Emission Limitation:

When this emissions unit is not being employed as an air pollution control device for emissions unit P007, the emissions of NO_x shall not exceed 0.30 pound per MM Btu when burning coal only.

Applicable Compliance Method:

Compliance with the NO_x emission limitation above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 7, 7A, 7C, 7D or 7E of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-110-05 as required by f)(1).

g) Miscellaneous Requirements

(1) None.



3. B014, 90.67 mmBtu/hr NG boiler

Operations, Property and/or Equipment Description:

90.67 MM Btu/hour Johnston Boiler Company Natural Gas Fired Boiler

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) b)(1)i. and g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	Install burners that are designed to meet 0.042 pound of nitrogen oxides (NO _x) per million (MM) Btu and 0.036 pound of carbon monoxide (CO) per MM Btu when not serving as an air pollution control device.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Install burners that are designed to meet 0.001 pound of particulate emissions (PE) per MM Btu and 0.004 pound of volatile organic compounds (VOC) per MM Btu. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b. below.
d.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	The PE shall not exceed 0.020 pound per million Btu of actual heat input. This emission limitation is less stringent than the emission limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-18-06(A)	Fuel burning equipment are exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
g.	OAC rule 3745-110-03(B)	When this emissions unit is not being employed as an air pollution control device for emissions unit P007, the emissions of NO _x shall not exceed 0.10 pound per MM Btu when burning natural gas only.
h.	OAC rule 3745-110-03(K)(14)	When this emissions unit is being employed as an air pollution control device for emissions unit P007, the requirements of paragraphs (A) to (G) of OAC rule 3745-110-03 shall not apply.
i.	OAC rule 3745-114-01	See g)(1) below.
j.	40 CFR Part 60, Subpart Dc	See b)(2)c., d)(3), d)(4), d)(5) and e)(3) below.
k.	40 CFR Part 60, Subpart A (40 CFR 60.1-60.19)	General Provisions
l.	40 CFR Part 63, Subpart DDDDD	Exempt per §63.7491(h) of 40 CFR Part 63, Subpart DDDDD since this boiler is used as a control device for emissions unit P007 to comply with Subpart U of 40 CFR Part 63.

(2) Additional Terms and Conditions

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



The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO₂ and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PE, SO₂ and VOC is less than 10 tons per year.

- c. There are no applicable emission limitations established pursuant to this rule for emissions units which combust only natural gas.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit as fuel. For the purposes of this requirement, VOC emissions from emissions unit P007 burned in this emissions unit shall not be considered a fuel.

[Authority of term: OAC rule 3745-31-05 and 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, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit. For the purposes of this requirement, VOC emissions from emissions unit P007 burned in this emissions unit shall not be considered a fuel.

[Authority of term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

- (2) 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 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 daily 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.

[Authority of term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

- (3) Except as provided under d)(4) and d)(5) below, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

[Authority of term: §63.48c(g)(1) of 40 CFR Part 60 Subpart Dc and OAC rule 3745-77-07(C)(1)]

- (4) As an alternative to meeting the requirements of d)(3) above, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

[Authority of term: §63.48c(g)(2) of 40 CFR Part 60 Subpart Dc and OAC rule 3745-77-07(C)(1)]

- (5) As an alternative to meeting the requirements of d)(3) above, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

[Authority of term: §63.48c(g)(3) of 40 CFR Part 60 Subpart Dc and 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 was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority of term: OAC rule 3745-31-05 and 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 of term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

- (3) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of 40 CFR Part 60. This notification shall include:
 - a. The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - b. If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c or §60.43c.
 - c. The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
 - d. Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

[Authority of term: §63.48c(a) of 40 CFR Part 60 Subpart Dc and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible PE limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

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



b. Emission Limitations:

Install burners that are designed to meet 0.042 pound of NO_x per MM Btu and 0.036 pound of CO per MM Btu when not serving as an air pollution control device.

Install burners that are designed to meet 0.001 pound of PE per MM Btu and 0.004 pound of VOC per MM Btu.

Applicable Compliance Method:

Compliance with the emission limitations above shall be based on Johnston Boiler Company's design specification sheet for the burner emissions dated March 10, 2014.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

The PE shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable PE limitation above shall be demonstrated by dividing the PE factor 7.6 pounds of PE per million scf of natural gas fired* by 1020 Btu per scf.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC rule 3745-17-03(B)(9).

*AP-42 emission factor from Table 1.4-2 dated 7/98.

[Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

When this emissions unit is not being employed as an air pollution control device for emissions unit P007, the emissions of NO_x shall not exceed 0.10 pound per MM Btu when burning natural gas only.

Applicable Compliance Method:

If required, compliance with the NO_x emission limitations above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 7, 7a, 7c, 7d or 7e of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-110-05 and OAC rule 3745-77-07(C)(1)]



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g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Permit to Install (PTI) prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



4. F004, Ash Handling

Operations, Property and/or Equipment Description:

Ash Handling

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule (i.e., scrubber stack). The presence of water vapor in the scrubber plume does not constitute visible emissions.
b.	OAC rule 3745-17-07(B)	Visible PE from any fugitive dust source shall not exceed twenty per cent opacity as a three-minute average (i.e., fly ash and/or bottom ash vacuum conveying to silos and fly ash and/or bottom ash silo load-out by auger conveying into trucks and/or railcars).
c.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)a. through b)(2)c. below).
d.	OAC rule 3745-17-11	The PE from the scrubber stack shall not exceed 6.52 pounds per hour.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures on all fly ash and/or bottom ash vacuum conveying equipment for the purpose of ensuring



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compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintaining total enclosure of such equipment to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

[Authority for term: OAC rule 3745-17-08]

- b. The permittee shall employ reasonably available control measures for the dumping of fly ash and/or bottom ash from storage silos to trucks for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to apply sufficient water to the fly ash and/or bottom ash during any load-out from storage silos to trucks to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

[Authority for term: OAC rule 3745-17-08]

- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

[Authority for term: OAC rule 3745-17-08]

- d. There are no vents to the atmosphere associated with the silo.
- e. The emissions from the primary and secondary receivers shall be vented to the wet scrubber at all times the primary and/or secondary receiver is in operation.
- f. On December 15, 2014, this emissions unit ceased to operate.
- g. If this emissions unit remains shut down for more than 2 years, before it recommences operation, the permittee shall be required to comply with all federal and Ohio EPA new source review requirements and federal New Source Performance Standards that are applicable, if any. The permittee shall notify Akron Regional Air Quality Management District (ARAQMD) at least 60 days prior to recommencing operation of this emissions unit.

Before this emissions unit recommences operation, the permittee shall demonstrate, in accordance with U.S. EPA guidance,* whether or not the emissions unit is subject to any federal and Ohio EPA new source review requirements and any federal New Source Performance Standards. If the demonstration shows that the emissions unit is subject to federal and Ohio EPA new source review requirements and/or federal New Source Performance Standards due to recommencing operation, the emissions unit shall remain shut down until such time that the permittee applies for and obtains a permit to install for this emissions unit. After the permittee obtains the permit to install, the emissions unit shall be operated in accordance with the terms and conditions of the permit to install, and the existing terms and conditions of this Title V permit



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shall be modified to incorporate the requirements of the permit to install within 12 months after recommencing operation of this emissions unit.

If the emissions unit is not subject to any federal and Ohio EPA new source review requirements and federal New Source Performance Standards due to recommencing operation, the permittee may recommence operation of this emissions unit in accordance with the terms and conditions in this Title V permit.

* EPA Memorandum from Edward E. Reich, Director of the Division of Stationary Source Enforcement, to Conrad Simon, Director of Air and Waste Management Division, Region II (July 9, 1982)

* EPA letter from William L. MacDowell, Chief of the regulation Development Section, Region V, to James H. Schlender, Executive Administrator, Great Lakes Indian Fish & Wildlife Commission (March 10, 1992)

* EPA Memorandum from Sandra S. Gardebring, Director, Division of Enforcement, to Edward E. Reich, Director, Division of Stationary Source Enforcement (September 22, 1980)

* EPA Memorandum from Edward E. Reich, Director of the Division of Stationary Source Enforcement, to Sandra S. Gardebring, Director, Division of Enforcement (Oct. 3, 1980)

* EPA Memorandum from John B. Rasnic, Stationary Source Compliance Division, Office of Air Quality Planning and Standards, to Douglas M. Skie, Chief, Air Program Branch (Nov. 19, 1991)

* EPA Memorandum from Edward E. Reich, Director of the Division of Stationary Source Enforcement, to Stephen A. Dvorkin, Chief, General Enforcement Branch, Region II (Sept. 6, 1978)

* EPA Memorandum from William K. Sawyer, Attorney, General Enforcement Branch, Region II, Edward E. Reich, Director of the Division of Stationary Source Enforcement (July 28, 1980)

* EPA Memorandum from Edward E. Reich, Director of the Division of Stationary Source Enforcement, to William K. Sawyer, Attorney, General Enforcement Branch, Region II (August 8, 1980)

* EPA Memorandum from John S. Seitz, Director, Stationary Source Compliance Division, Office of Air Quality Planning and Standards, to Howekamp, Director, Air Management Division, Region IX (May 27, 1987)

* In regard to Monroe Electric Generating Plant, Petition No. 6-99-2, at 9 (June 11, 1999)

c) Operational Restrictions

(1) None.

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

- (1) On December 15, 2014, this emissions unit ceased to operate. The permittee shall not have to perform the monitoring and/or record keeping in d)(2) through d)(5) below as long as this emissions unit is shut down. If this emissions unit recommences operation, then the permittee shall immediately comply with the monitoring and/or record keeping requirements in d)(2) through d)(5) below.
- (2) 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 and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 daily 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.

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

- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 30 gallons per minute.

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

- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit(s), including periods of startup and shutdown. The permittee shall record the scrubber liquid's flow rate on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's



recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

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

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

The limit for the liquid flow rate 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 for the liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this

emissions unit. In addition, approved revisions to the 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.

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

e) Reporting Requirements

(1) On December 15, 2014, this emissions unit ceased to operate. The permittee shall not have to submit the report in e)(2) through e)(4) below as long as this emissions unit is shut down. If this emissions unit recommences operation, then the permittee shall immediately comply with the reporting requirement in e)(2) through e)(4) below.

(2) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible PE were observed from the stack serving this emissions unit;
- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible PE from the stack and/or visible emissions of fugitive dust.

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(C)(1)]

(3) 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 scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
- b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
- c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and



- e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

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

[Authority of Term: OAC rule 3745-15-03(A)]

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 PE from any fugitive dust source shall not exceed twenty per cent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

[Authority for term: OAC rule 3745-17-03(B)(3) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

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



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c. Emission Limitation:

The PE from the scrubber stack shall not exceed 6.52 pounds per hour.

Applicable Compliance Method:

If required, compliance with the allowable PE limitation above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



5. P002, Solid Superlite Process

Operations, Property and/or Equipment Description:

Solid Superlite Process

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)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by rule (i.e., if baghouse stack is not complying with no visible particulate emissions from the exhaust stack in b)(1)c. below)
b.	OAC rule 3745-17-07(B)	Visible PE from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.
c.	OAC rule 3745-17-08(B)	The installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust. Such equipment shall meet the following requirements: (a) The collection efficiency is sufficient to minimize or eliminate visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and (b) The control equipment achieves an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases or there are no visible PE from the exhaust stack(s), whichever is less stringent.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) 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 and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 daily 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.

[Authority of term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) 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;



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- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

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(C)(1)]

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

[Authority of Term: OAC rule 3745-15-03(A)]

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 PE from any stack shall not exceed twenty percent opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation above shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A 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:

Visible PE from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.



Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

[Authority for term: OAC rule 3745-17-03(B)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

The control equipment achieves an outlet emission rate of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases or there are no visible PE from the exhaust stack(s), whichever is less stringent.

Applicable Compliance Method

If required, compliance with the requirement for no visible PE from the exhaust stack, identified in this permit, shall be determined in accordance with Method 22 of 40 CFR Part 60, Appendix A.

If opting to comply with the outlet PE rate and if required, compliance with the 0.030 grain of PE per dry standard cubic foot of exhaust gases from the stack shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, as appropriate.

[Authority for term: OAC rule 3745-17-03(B)(7)(a) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



6. P003, Superlite

Operations, Property and/or Equipment Description:

Superlite - Organic Rubber Chemical, reactor, stripper, condensers, and filter.

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(B)	Visible particulate emissions (PE) from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.
b.	OAC rule 3745-17-08	The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust. The collection efficiency shall be sufficient to minimize or eliminate visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
c.	OAC rule 3745-21-09(BBB)(2)	For the Superlite (trademark) process, the VOC emissions from the reactor process vent streams, except the process emergency safety relief devices, shall be vented to a control device that is designed and operated to achieve a control efficiency of at least ninety-five per cent, by weight.
d.	40 CFR Part 63, Subpart FFFF [In accordance with 40 CFR 63.2435(b), this emissions unit is an existing miscellaneous organic chemical manufacturing process unit.]	Based on emission calculations, all Superlite process vents have collective uncontrolled HAP emissions less than 200 pounds per year thus meeting the definition of Group 2 batch process vents. This emission unit has only Group 2 storage tanks and has no transfer operations that meet the definition of a transfer rack.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	Table 12 to Subpart FFFF of Part 63 - Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The following unit operations emit particulates: the blender which is vented to a dust collector and the raw material load-in which is vented to a dust collector.
- b. The following unit operations emit VOC: the reactor, the filter, the stripper jet, the blend tank, the styrene weigh tank, and the pre-coat which are vented to a flare and the associated piping (i.e., connectors, flanges, pumps, etc.).
- c. The flare shall be designed for and operated with no visible emissions as determined by USEPA Method 22 of 40 CFR Part 60, Appendix A, except for periods not to exceed a total of five minutes during any one hundred twenty consecutive minutes.
- d. The flare shall be operated with a pilot flame. The flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame.
- e. The flare shall be nonassisted.
- f. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be two hundred Btu/scf or greater.
- g. Except as provided in b)(2)h. below, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than sixty feet per second.
- h. Excluded from the requirements of b)(2)g. above is any nonassisted flare that meets both of the following requirements:
 - i. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.
 - ii. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.



- i. The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design.
 - j. The flare shall be operated at all times when emissions may be vented to it.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

[Authority for term: OAC rule 3745-21-09(B)(4)(d) and OAC rule 3745-77-07(C)(1)]
 - (2) The permittee shall record the following information each day for the flare and the process operations:
 - a. all periods during which there was no pilot flame; and
 - b. the operating times for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit.
[Authority for term: OAC rule 3745-21-09(B)(4)(b)(i) & (x) and OAC rule 3745-77-07(C)(1)]
 - (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive 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 location and 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 daily 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.

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

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

<u>Section/Table:</u>	<u>Requirement:</u>
63.2485(a)	You must meet each requirement in Table 7 to this subpart that applies to your wastewater streams and liquid streams in open systems within an MCPU, except as specified in paragraphs (b) through (o) of this section.
Table 7	You must meet each requirement in Table 7 that applies to your wastewater streams and liquid streams in open systems within an MCPU.
63.2480(a)	You must meet each requirement in Table 6 to this subpart that applies to your equipment leaks, except as specified in paragraphs (b) through (d) of this section.
Table 6	You must meet each requirement in Table 6 that applies to your equipment leaks.
63.2490(a)	You must comply with each requirement in Table 10 to this subpart that applies to your heat exchange systems, except as specified in paragraphs (b) and (c) of this section.
Table 10	You must meet each requirement in Table 10 that applies to your heat exchange systems.
63.2525	You must keep the records specified in paragraphs (a) through (k) of this section.
63.2525(a)	Each applicable record required by Subpart A of 40 CFR Part 63 and in referenced Subparts F, G, SS, UU, WW, and GGG of 40 CFR Part 63 and in referenced Subpart F of 40 CFR part 65.
63.2525(e)	The information specified in paragraph (e)(2), (3), or (4) of this section, as applicable, for each process with Group 2 batch process vents or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. No records



are required for situations described in paragraph (e)(1) of this section.

63.2525(f)

A record of each time a safety device is opened to avoid unsafe conditions in accordance with §63.2450(s).

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

- a. a log of operating time for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit; and
- b. identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.

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

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(4)(c), and OAC rule 3745-77-07(C)(1)].

(2) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible 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(C)(1)]

(3) The permittee shall comply with the applicable notification and reporting requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections and tables:

<u>Section/Table:</u>	<u>Requirement:</u>
63.2515(a)	You must submit all of the notifications in §§63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified.
63.2515(b)	You must submit an initial notification not later than 120 calendar days after November 10, 2003.



- 63.2520(a) You must submit each report in Table 11 to this subpart that applies to you.
- 63.2520(b) You must submit each report by the date in Table 11 to this subpart and according to paragraphs (b)(1) through (5) of this section.
- 63.2520(d) You must submit a notification of compliance status report according to the schedule in paragraph (d)(1) of this section, and the notification of compliance status report must contain the information specified in paragraph (d)(2) of this section.
- 63.2520(e) The compliance report must contain the information specified in paragraphs (e)(1) through (10) of this section.
- Table 11 You must submit each report that applies to you on the schedule shown in Table 11.

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

[Authority of Term: OAC rule 3745-15-03(A)]

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 any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

[Authority for term: OAC rule 3745-17-03(C)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

For the Superlite (trademark) process, the VOC emissions from the reactor process vent streams, except the process emergency safety relief devices, shall be vented to a control device that is designed and operated to achieve a control efficiency of at least ninety-five per cent, by weight.



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Applicable Compliance Method:

Compliance with the allowable VOC control efficiency shall be assumed based upon the October 30, 2008 flare compliance assessment that demonstrated compliance with the net heating value for the gas being combusted and the maximum permitted exit velocity.

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

c. Emission Limitation:

No visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



7. P006, Resin D Process

Operations, Property and/or Equipment Description:

Resin D Process - Organic Rubber Chemical Antioxidant - reactors, washers, stills, recovery and finishing equipment

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 16-1525)	0.96 pound of volatile organic compounds (VOC) per hour 6.35 pounds of particulate emissions (PE) per hour
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-09(BBB)(1)	For the Resin D Process, the VOC emissions from the recovery system vents and product neutralization and distillation system vents, except wash kettles (or still feed) condenser vents, stills vacuum jet tailpipe vents, and process emergency safety relief devices, shall be vented to a flare that meets the requirements of paragraphs (DD)(10)(d), (DD)(10)(e), and (DD)(10)(f) of OAC rule 3745-21-09. See b)(2)d. through b)(2)k. below.
e.	40 CFR Part 63, Subpart FFFF [In accordance with 40 CFR	Reduce uncontrolled organic HAP emissions from one or more batch process vents within the process by



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	63.2435(b), this emissions unit is an existing miscellaneous organic chemical manufacturing process unit.]	venting through a closed-vent system to a flare. See b)(2)i. below. [Authority for term: Table 2 and section 63.2460(a) of 40 CFR Part 63, Subpart FFFF]
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	Table 12 to Subpart FFFF of Part 63 - Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The following unit operations emit particulates: the pastille system, the pastille storage, and the packaging station which are vented to a baghouse.
- b. The following unit operations emit VOC: the acetone recovery system, the aniline recovery system, the recovery system feed tank, the charge make-up system, the reaction system, the product neutralization system, the product distillation system which are vented to the flare and the associated piping (i.e., connectors, flanges, pumps, etc.).
- c. There is a wet scrubber on the pastille process used to reduce odors. This wet scrubber is not employed to comply with any applicable rules or regulations.
- d. The flare shall be designed for and operated with no visible emissions as determined by USEPA Method 22 of 40 CFR Part 60, Appendix A, except for periods not to exceed a total of five minutes during any one hundred twenty consecutive minutes.
- e. The flare shall be operated with a pilot flame. The flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame.
- f. The flare shall be nonassisted.
- g. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be two hundred Btu/scf or greater.
- h. Except as provided in b)(2)i. below, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than sixty feet per second.



- i. Excluded from the requirements of b)(2)h. above is any nonassisted flare that meets both of the following requirements:
 - i. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.
 - ii. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.
- j. The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design.
- k. The flare shall be operated at all times when emissions may be vented to it.
- l. The permittee shall comply with the applicable emission limits, work practices and compliance requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.2450(a)	You must be in compliance with the emission limits and work practice standards in Tables 1 through 7 to this subpart at all times, except during periods of startup, shutdown, and malfunction (SSM), and you must meet the requirements specified in §§63.2455 through 63.2490, except as specified in paragraphs (b) through (s) of this section. You must meet the notification, reporting, and recordkeeping requirements specified in §§63.2515, 63.2520, and 63.2525.
63.2450(b)	You must determine if an emission stream is a halogenated vent stream, as defined in §63.2550, by calculating the mass emission rate of halogen atoms in accordance with §63.115(d)(2)(v). Alternatively, you may elect to designate the emission stream as halogenated.
63.2450(e)(2)	If you reduce organic HAP emissions by venting emissions through a closed-vent system to a flare, you must meet the requirements of §63.982(b) and the requirements referenced therein.
63.2460(a)	You must meet each emission limit in Table 2 to this subpart that applies to you, and you must meet each applicable requirement specified in paragraphs (b) and (c) of this section.

c) Operational Restrictions

- (1) None.

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

- (1) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 3.5 to 6.0 inches of water.
- (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(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on 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;
- 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 PE rate for the controlled emissions unit. 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.

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

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE 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 daily 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.

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

- (4) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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



- (5) The permittee shall record the following information each day for the flare and the process operations:
 - a. all periods during which there was no pilot flame; and
 - b. the operating times for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit.

[Authority for term: OAC rule 3745-31-05, OAC rule 3745-21-09(B)(4)(b)(i) & (x), and OAC rule 3745-77-07(C)(1)]

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

<u>Section/Table:</u>	<u>Requirement:</u>
63.2450(f)(2)	If you elect to meet the requirements in §63.11(b)(6)(i), you must keep flare compliance assessment records as specified in paragraphs (f)(2)(i) and (ii) of this section.
63.2450(k)	The provisions in paragraphs (k)(1) through (6) of this section apply in addition to the requirements for continuous parameter monitoring system (CPMS) in Subpart SS of 40 CFR Part 63.
63.2460(c)	Exceptions to the requirements in Subparts SS and WW of 40 CFR Part 63 are specified in paragraphs (c)(1) through (9) of this section.
63.2480(a)	You must meet each requirement in Table 6 to this subpart that applies to your equipment leaks, except as specified in paragraphs (b) through (d) of this section.
Table 6	You must meet each requirement in table 6 that applies to your equipment leaks.
63.2490(a)	You must comply with each requirement in Table 10 to this subpart that applies to your heat exchange systems, except as specified in paragraphs (b) and (c) of this section.
Table 10	You must meet each requirement in Table 10 that applies to your heat exchange systems.
63.2525	You must keep the records specified in paragraphs (a) through (k) of this section.
63.2525(a)	Each applicable record required by Subpart A of 40 CFR Part 63 and in referenced Subparts F, G, SS, UU, WW, and GGG of 40 CFR Part 63 and in referenced Subpart F of 40

CFR part 65.

- 63.2525(b) Records of each operating scenario as specified in paragraphs (b)(1) through (8) of this section.
- 63.2525(c) A schedule or log of operating scenarios for processes with batch vents from batch operations updated each time a different operating scenario is put into effect.
- 63.2525(d) The information specified in paragraphs (d)(1) and (2) of this section for Group 1 batch process vents in compliance with a percent reduction emission limit in Table 2 to this subpart if some of the vents are controlled to less the percent reduction requirement.
- 63.2525(e) The information specified in paragraph (e)(2), (3), or (4) of this section, as applicable, for each process with Group 2 batch process vents or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. No records are required for situations described in paragraph (e)(1) of this section.
- 63.2525(f) A record of each time a safety device is opened to avoid unsafe conditions in accordance with §63.2450(s).
- 63.2525(g) Records of the results of each CPMS calibration check and the maintenance performed, as specified in §63.2450(k)(1).
- 63.2525(j) In the SSMP required by §63.6(e)(3), you are not required to include Group 2 emission points, unless those emission points are used in an emissions average. For equipment leaks, the SSMP requirement is limited to control devices and is optional for other equipment.

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 “a” (above) where a prompt investigation was not conducted;



- d. each incident of deviation described in “a” 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 “a” 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.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[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 PE were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible PE.

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(C)(1)]

- (3) The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit; and
 - b. identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.

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

[Authority for term: OAC rule 3745-31-05, OAC rule 3745-21-09(B)(4)(c), and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall comply with the applicable notification and reporting requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections and tables:

<u>Section/Table:</u>	<u>Requirement:</u>
63.2515(a)	You must submit all of the notifications in §§63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified.



- 63.2515(b) You must submit an initial notification not later than 120 calendar days after November 10, 2003.
- 63.2515(c) If you are required to conduct a performance test, you must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in §63.7(b)(1). For any performance test required as part of the initial compliance procedures for batch process vents in Table 2 to this subpart, you must also submit the test plan required by §63.7(c) and the emission profile with the notification of the performance test.
- 63.2520(a) You must submit each report in Table 11 to this subpart that applies to you.
- 63.2520(b) You must submit each report by the date in Table 11 to this subpart and according to paragraphs (b)(1) through (5) of this section.
- 63.2520(d) You must submit a notification of compliance status report according to the schedule in paragraph (d)(1) of this section, and the notification of compliance status report must contain the information specified in paragraph (d)(2) of this section.
- 63.2520(e) The compliance report must contain the information specified in paragraphs (e)(1) through (10) of this section.
- Table 11 You must submit each report that applies to you on the schedule shown in Table 11.
- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority of Term: OAC rule 3745-15-03(A)]

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 PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:



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

[Authority for term: OAC rule 3745-31-05, OAC rule 3745-17-03(B)(1), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

6.35 pounds of PE per hour

Applicable Compliance Method:

If required, compliance with the hourly PE limitation above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

0.96 pound of VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be determined by multiplying the maximum amount of VOC vented from this emissions unit to the flare by (1-0.98*).

*The control efficiency of the flare is assumed to be 98%.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

No visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

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

Section: Requirement:



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63.2450(f)(1) As part of a flare compliance assessment required in §63.987(b), you have the option of demonstrating compliance with the requirements of §63.11(b) by complying with the requirements in either §63.11(b)(6)(i) or §63.987(b)(3)(ii).

g) Miscellaneous Requirements

(1) None.



8. P007, Latex

Operations, Property and/or Equipment Description:

Latex - Synthetic Rubber Latex Manufacturing - polymerizers, blowdown tanks, concentrators, blend tanks, etc.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(2)	This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound (OC) emissions by an overall control efficiency of at least eighty-five per cent, by weight. If the reductions are achieved by incineration, ninety per cent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
b.	40 CFR Part 63, Subpart U [In accordance with 40 CFR 63.480(a)(2), this emissions unit is an existing elastomer product process unit subject to the emissions limitations/ control measures specified in this section.]	For each aggregate batch vent stream, reduce organic HAP emissions by 90 weight percent or to a concentration of 20 ppm _v , whichever is less stringent, on a continuous basis using a control device. For purposes of complying with the 20 ppm _v outlet concentration standard, the outlet concentration shall be calculated on a dry basis. When a combustion device is used for purposes of complying with the 20 ppm _v outlet concentration standard, the concentration shall be corrected to 3 percent oxygen if supplemental combustion air is used to combust the emissions. If supplemental combustion air is not used, a correction to 3 percent oxygen is not required. [Authority for term: 40 CFR 63.487(b)(2)]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart A	Table 1 to Subpart U of Part 63 - Applicability of General Provisions to Subpart U shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	40 CFR Part 63, Subparts F, G, & H	Table 2 to Subpart U of Part 63 - Applicability of Subparts F, G, & H of Part 63 shows which parts of these Subparts are applicable.

(2) Additional Terms and Conditions

- a. The following unit operations emit OC and are subject to OAC rule 3745-21-07(M)(2) and 40 CFR Part 63, Subpart U: the reactors, the blowdown tank, the thin-film evaporation, the vacuum jets, and the foam knockdown tank which are vented to either the natural gas fired boiler (B014), the natural gas fired boiler (B001) or the coal fired boiler (B008) and the associated piping (i.e., connectors, flanges, pumps, etc.).
- b. The permittee shall comply with the applicable emission standards and provisions required under 40 CFR Part 63, Subpart U, including the following sections:

Section: Requirement:

63.483(a) At all times, each owner or operator must operate and maintain any affected source subject to the requirements of 40 CFR Part 63, Subpart U, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Except as allowed under paragraphs (b) through (d) of this section, the owner or operator of an existing or new affected source shall comply with the provisions in:

- (1) Section 63.484 for storage vessels;
- (2) Sections 63.486 through 63.492 for batch front-end process vents;
- (3) Section 63.501 for wastewater;
- (4) Section 63.502 for equipment leaks;
- (5) Section 63.504 for additional test methods and procedures;



(6) Section 63.505 for monitoring levels and excursions; and

(7) Section 63.506 for general reporting and recordkeeping requirements.

63.484(a) This section applies to each storage vessel that is assigned to an affected source, as determined by §63.480(g). Except for those storage vessels exempted by paragraph (b) of this section, the owner or operator of affected sources shall comply with the requirements of §§63.119 through 63.123 and 63.148, with the differences noted in paragraphs (c) through (s) of this section, for the purposes of 40 CFR Part 63, Subpart U.

63.486(b) Aggregate batch vent streams, as defined in §63.482, are subject to the control requirements specified in §63.487(b), as well as the monitoring, testing, recordkeeping, and reporting requirements specified in §§63.489 through 63.492 for aggregate batch vent streams.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart U, including the following sections and table:

Section/Table: Requirement:

63.487(d) If a boiler or process heater is used to comply with the percent reduction requirement specified in paragraph (a)(2) or (b)(2) of this section, the batch front-end process vent or aggregate batch vent stream shall be introduced into the flame zone of such a device.

Table 7 Minimum Firebox Temperature

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable value for the daily average temperature in the firebox of the natural gas fired boiler (B014) when the emissions unit is in operation shall not be below 1227 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable value for the daily average temperature in the firebox of the natural gas fired boiler (B001) shall not be below 866 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable value for the daily average temperature in the firebox of the coal boiler (B008) when the emissions unit is in operation shall not be below 907 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

- (4) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature in the firebox of the boiler when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. the identification of the boiler being employed as the control equipment for this emissions unit;
- b. the daily average temperature in the firebox of the boiler that is being employed as the control equipment for this emissions unit; and
- c. a log (date and total time) of the downtime or bypass of the capture (collection) system and the boiler, and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.

If all recorded values of the temperature in the firebox are above the minimum established temperature in either d)(1), d)(2) or d)(3) above, the permittee may record that all values were above the minimum temperature rather than calculating and recording the daily average temperature for that operating day.

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

- (5) Whenever the monitored values for the daily average temperature in the firebox of the boiler deviates from the limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.



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

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

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

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature 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.

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

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

Section/Table: Requirement:

63.488(a)	Except as provided in paragraph (a)(3) of this section, the owner or operator of batch front-end process vents at affected sources shall determine the group status of each batch front-end process vent in accordance with the provisions of this section. This determination may be based on either organic HAP or TOC emissions.
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63.489(a)	Each owner or operator of a batch front-end process vent or aggregate batch vent stream that uses a control device to comply with the requirements in §63.487(a)(2) or §63.487(b)(2) shall install the monitoring equipment specified in paragraph (b) of this section. All
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monitoring equipment shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.

- 63.489(b)(3) Where a boiler or process heater of less than 44 megawatts design heat input capacity is used, a temperature monitoring device in the firebox equipped with a continuous recorder is required.
- 63.489(e) Parameter monitoring levels for batch front-end process vents and aggregate batch vent streams shall be established as specified in paragraphs (e)(1) through (e)(3) of this section.
- 63.489(e)(1) For each parameter monitored under paragraph (b) or (c) of this section, the owner or operator shall establish a level, defined as either a maximum or minimum operating parameter as denoted in Table 7 of 40 CFR Part 63, Subpart U, that indicates proper operation of the control device. The level shall be established in accordance with the procedures specified in §63.505.
- 63.489(e)(2) The established level, along with supporting documentation, shall be submitted in the Notification of Compliance Status or the operating permit application as required in §63.506(e)(5) or §63.506(e)(8), respectively.
- 63.489(e)(3) The operating day shall be defined as part of establishing the parameter monitoring level and shall be submitted with the information in paragraph (e)(2) of this section. The definition of operating day shall specify the time(s) at which an operating day begins and ends. The operating day shall not exceed 24 hours.
- 63.491(a) Except as provided in paragraphs (a)(7) and (a)(8) of this section, each owner or operator of an affected source shall maintain the records specified in paragraphs (a)(1) through (a)(6) of this section for each batch front-end process vent subject to the group determination procedures of §63.488.
- 63.491(b)(4)(ii) For a boiler or process heater, a description of the location at which the vent stream is introduced into the boiler or process heater.
- 63.491(b)(4)(iii) For a boiler or process heater with a design heat input capacity of less than 44 megawatts and where the process vent stream is introduced with combustion air or is used as a secondary fuel and is not mixed with the primary fuel, the percent reduction of organic HAP or TOC achieved, as determined using the procedures specified in §63.490(c) for batch front-end process vents and §63.490(e) for aggregate batch vent streams.
- 63.491(c) For each parameter monitored according to §63.489(b) and Table 6 of 40 CFR Part 63, Subpart U, maintain documentation showing the

establishment of the level that indicates proper operation of the control device as required by §63.489(e) for parameters specified in §63.489(b). This documentation shall include the parameter monitoring data used to establish the level.

Table 6	Group 1 Batch Front-End Process Vents and Aggregate Batch Vent Streams - Monitoring, Recordkeeping, and Reporting Requirements
63.491(f)(1)	Continuous records of the equipment operating parameters specified to be monitored under §63.489(b) and listed in Table 6 of 40 CFR Part 63, Subpart U, as applicable.
63.491(f)(2)	Records of the daily average value of each continuously monitored parameter for each operating day determined according to the procedures specified in §63.506(d).
63.501(a)	Except as specified in paragraph (c) of this section, the owner or operator of each affected source shall comply with the requirements of §§63.132 through 63.147 for each process wastewater stream originating at an affected source, with the requirements of §63.148 for leak inspection provisions, and with the requirements of §63.149 for equipment that is subject to §63.149, with the differences noted in paragraphs (a)(1) through (a)(23) of this section. Further, the owner or operator of each affected source shall comply with the requirements of §63.105(a) for maintenance wastewater, as specified in paragraph (b) of this section.
63.502(a)	The owner or operator of each affected source, shall comply with the requirements of Subpart H of 40 CFR Part 63, with the exceptions noted in paragraphs (b) through (m) of this section. Surge control vessels required to be controlled by Subpart H may, alternatively, comply with the Group 1 storage vessel provisions specified in §63.484.
63.502(n)	The owner or operator of each affected source shall comply with the requirements of §63.104 for heat exchange systems, with the exceptions noted in paragraphs (n)(1) through (n)(5) of this section.
63.505(b)	In cases where a performance test is required by 40 CFR Part 63, Subpart U, or the owner or operator of the affected source elects to do a performance test in accordance with the provisions of 40 CFR Part 63, Subpart U, and an owner or operator elects to establish a parameter monitoring level for a control, recovery, or recapture device based exclusively on parameter values measured during the performance test, the owner or operator of the affected source shall comply with the procedures in paragraphs (b)(1) through (b)(4) of this section, as applicable.
63.505(b)(2)	During initial compliance testing, the appropriate parameter shall be continuously monitored during the required 1-hour runs. The

monitoring level(s) shall then be established as the average of the maximum (or minimum) point values from the three test runs. The average of the maximum values shall be used when establishing a maximum level, and the average of the minimum values shall be used when establishing a minimum level.

- 63.505(b)(4) For aggregate batch vent streams, the monitoring level shall be established in accordance with paragraph (b)(2) of this section.
- 63.505(g) With respect to storage vessels (where the applicable monitoring plan specifies continuous monitoring), aggregate batch vent streams and process wastewater streams, an excursion means any of the three cases listed in paragraphs (g)(1)(i) through (g)(1)(iii) of this section.
- 63.505(g)(1)(iv) Monitoring data are insufficient to constitute a valid hour of data, as used in paragraphs (g)(1)(ii) and (g)(1)(iii) of this section, if measured values are unavailable for any of the 15-minute periods within the hour. For data compression systems approved under §63.506(g)(3), monitoring data are insufficient to calculate a valid hour of data if there are less than four data measurements made during the hour.
- 63.505(g)(1)(v) The periods listed in paragraphs (g)(1)(v)(A) through (g)(1)(v)(E) of this section are not considered to be part of the period of control or recovery device operation, for the purposes of paragraphs (g)(1)(ii) and (g)(1)(iii) of this section.
- 63.505(h) A number of excused excursions shall be allowed for each control or recovery device for each semiannual period. The number of excused excursions for each semiannual period is specified in paragraphs (i)(1) through (i)(6) of this section. This paragraph applies to affected sources required to submit Periodic Reports semiannually or quarterly. The first semiannual period is the 6-month period starting the date the Notification of Compliance Status is due.
- 63.506(a) Unless otherwise specified in 40 CFR Part 63, Subpart U, the owner or operator of an affected source shall keep copies of all applicable records and reports required by 40 CFR Part 63, Subpart U for at least 5 years, as specified in paragraph (a)(1) of this section, with the exception listed in paragraph (a)(2) of this section.
- 63.506(b) The owner or operator of an affected source shall comply with the applicable recordkeeping and reporting requirements in 40 CFR Part 63, Subpart A as specified in Table 1 of 40 CFR Part 63, Subpart U. These requirements include, but are not limited to, the requirements specified in paragraphs (b)(1) and (b)(2) of this section.

63.506(d) Owners or operators required to keep continuous records shall keep records as specified in paragraphs (d)(1) through (d)(7) of this section, unless an alternative recordkeeping system has been requested and approved as specified in paragraph (g) of this section, and except as provided in paragraph (h) of this section.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all days which the daily average temperature in the firebox of the natural gas fired boiler (B014) does not comply with the temperature limitation specified above;
 - b. all days which the daily average temperature in the firebox of the natural gas fired boiler (B001) does not comply with the temperature limitation specified above;
 - c. all days which the daily average temperature in the firebox of the coal boiler (B008) does not comply with the temperature limitation specified above;
 - d. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to one of the boilers;
 - e. each incident of deviation described in “a”, “b”, “c” or “d” (above) where a prompt investigation was not conducted;
 - f. each incident of deviation described in “a”, “b”, “c” or “d” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the boiler into compliance with the acceptable limit, was determined to be necessary and was not taken; and
 - g. each incident of deviation described in “a”, “b”, “c” or “d” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

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

Section/Table: Requirement:

63.492(a) The owner or operator of a batch front-end process vent or aggregate batch vent stream at an affected source shall submit the information specified in paragraphs (a)(1) through (a)(6) of this section, as

appropriate, as part of the Notification of Compliance Status specified in §63.506(e)(5).

- 63.492(b) Whenever a process change, as defined in §63.488(i)(1), is made that causes a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent, the owner or operator shall notify the Administrator and submit a description of the process change within 180 days after the process change is made or with the next Periodic Report, whichever is later. The owner or operator of an affected source shall comply with the Group 1 batch front-end process vent provisions in §§63.486 through 63.492 in accordance with §63.480(i)(2)(ii).
- 63.506(b)(1)(ii) For the purposes of 40 CFR Part 63, Subpart U, the semiannual start-up, shutdown, and malfunction reports shall be submitted on the same schedule as the Periodic Reports required under paragraph (e)(6) of this section instead of the schedule specified in §63.10(d)(5)(i). The reports shall include the information specified in §63.10(d)(5)(i).
- 63.506(e)(1) Owners and operators shall not be in violation of the reporting requirements of 40 CFR Part 63, Subpart U for failing to submit information required to be included in a specified report if the owner or operator meets the requirements in paragraphs (e)(1)(i) through (e)(1)(iii) of this section. Examples of circumstances where this paragraph may apply include information related to newly-added equipment or emission points, changes in the process, changes in equipment required or utilized for compliance with the requirements of 40 CFR Part 63, Subpart U, or changes in methods or equipment for monitoring, recordkeeping, or reporting.
- 63.506(e)(2) All reports required under 40 CFR Part 63, Subpart U shall be sent to the Administrator at the appropriate address listed in §63.13. If acceptable to both the Administrator and the owner or operator of a source, reports may be submitted on electronic media.
- 63.506(e)(5) For existing and new affected sources, a Notification of Compliance Status shall be submitted. For equipment leaks subject to §63.502, the owner or operator shall submit the information required in §63.182(c) in the Notification of Compliance Status within 150 days after the first applicable compliance date for equipment leaks in the affected source, and an update shall be provided in the first Periodic Report that is due at least 150 days after each subsequent applicable compliance date for equipment leaks in the affected source. For all other emission points, including heat exchange systems, the Notification of Compliance Status shall contain the information listed in paragraphs (e)(5)(i) through (e)(5)(xii) of this section, as applicable, and shall be submitted no later than 150 days after the compliance dates specified in 40 CFR Part 63, Subpart U.
- 63.506(e)(6) For existing and new affected sources, the owner or operator shall submit Periodic Reports as specified in paragraphs (e)(6)(i) through



(e)(6)(xii) of this section. In addition, for equipment leaks subject to §63.502, the owner or operator shall submit the information specified in §63.182(d) under the conditions listed in §63.182(d), and for heat exchange systems subject to §63.502(n), the owner or operator shall submit the information specified in §63.104(f)(2) as part of the Periodic Report required by this paragraph (e)(6). Section §63.505 shall govern the use of monitoring data to determine compliance for Group 1 emission points.

63.506(e)(7) Other reports shall be submitted as specified in paragraphs (e)(7)(i) through (e)(7)(v) of this section.

63.506(i)(1) As of January 1, 2012, and within 60 days after the date of completing each performance test, as defined in §63.2 and as required in 40 CFR Part 63, Subpart U, you must submit performance test data, except opacity data, electronically to EPA's Central Data Exchange by using the Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/ert_tool.html/) or other compatible electronic spreadsheet. Only data collected using test methods compatible with ERT are subject to this requirement to be submitted electronically into EPA's WebFIRE database.

63.506(i)(2) All reports required by 40 CFR Part 63, Subpart U not subject to the requirements in paragraphs (i)(1) of this section must be sent to the Administrator at the appropriate address listed in §63.13. If acceptable to both the Administrator and the owner or operator of a source, these reports may be submitted on electronic media. The Administrator retains the right to require submittal of reports subject to paragraph (i)(1) of this section in paper format.

Table 6 Group 1 Batch Front-End Process Vents and Aggregate Batch Vent Streams - Monitoring, Recordkeeping, and Reporting Requirements

Table 9 Routine Reports Required by 40 CFR Part 63, Subpart U

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

[Authority of Term: OAC rule 3745-15-03(A)]

f) Testing Requirements

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



a. Emission Limitations:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the OC emissions by an overall control efficiency of at least eighty-five per cent, by weight. If the reductions are achieved by incineration, ninety per cent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method:

If required, compliance with the OC emission limitations above shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

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

b. Emission Limitation:

For each aggregate batch vent stream, reduce organic HAP emissions by 90 weight percent or to a concentration of 20 ppm_v, whichever is less stringent, on a continuous basis using a control device. For purposes of complying with the 20 ppm_v outlet concentration standard, the outlet concentration shall be calculated on a dry basis. When a combustion device is used for purposes of complying with the 20 ppm_v outlet concentration standard, the concentration shall be corrected to 3 percent oxygen if supplemental combustion air is used to combust the emissions. If supplemental combustion air is not used, a correction to 3 percent oxygen is not required.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable organic HAP emission limitation above based on the results of emission testing conducted in accordance §§ 63.490(e) and 63.504 of 40 CFR Part 63, Subpart U.

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

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

Section: Requirement:

63.490(e) Except as specified in paragraphs (e)(1) through (e)(3) of this section, owners or operators of aggregate batch vent streams complying with §63.487(b)(2) shall conduct a performance test using the performance testing procedures for continuous front-end process vents in §63.116(c).

63.504(a) Performance testing shall be conducted in accordance with §63.7(a)(1), (a)(3), (d), (e)(1), (e)(2), (e)(4), (g), and (h), with the exceptions specified in paragraphs (a)(1) through (a)(5) of this section and the additions specified in paragraph (b) of this section. Sections 63.484 through 63.501 also



Preliminary Proposed Title V Permit

Emerald Performance Materials, LLC

Permit Number: P0113378

Facility ID: 1677010029

Effective Date: To be entered upon final issuance

contain specific testing requirements.

63.504(b) Data shall be reduced in accordance with the EPA approved methods specified in the applicable subpart or, if other test methods are used, the data and methods shall be validated according to the protocol in Method 301, 40 CFR part 63, Appendix A.

g) Miscellaneous Requirements

(1) None.



9. P012, DEPA

Operations, Property and/or Equipment Description:

DEPA - Organic Rubber Chemical - reactor, wash tank, feed tank, filter

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.	None	None

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

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. None.

g) Miscellaneous Requirements

(1) None.



10. P016, DPA A/O

Operations, Property and/or Equipment Description:

DPA A/O - Petroleum Additives & Rubber Antioxidants - reactors, washers, stills, filter, recovery equipment

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 16-1843)	2.0 pounds of volatile organic compounds (VOC) per hour 8.8 tons of VOC per year See b)(2)b. through b)(2)i. below.
b.	OAC rule 3745-21-09(BBB)(3)	For the diphenylamine-based antioxidants process, the VOC emissions from the reactor process vent streams, except the emulsion recovery system tank vent, recovered MND tank vent, and process emergency safety relief devices, shall be vented to a control device that is designed and operated to achieve a control efficiency of at least ninety-five percent, by weight.
c.	40 CFR Part 63, Subpart FFFF [In accordance with 40 CFR 63.2435(b), this emissions unit is an existing miscellaneous organic chemical manufacturing process unit.]	Based on emission calculations, all DPA A/O process vents have collective uncontrolled HAP emissions less than 200 pounds per year thus meeting the definition of Group 2 batch process vents. This emission unit has only Group 2 storage tanks and has no transfer operations that meet the definition of a transfer rack.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	Table 12 to Subpart FFFF of Part 63 - Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The following unit operations emit VOC: the north and south recovered hydrocarbon feed tanks; the north and south hydrocarbon feed tanks; the north and south reactors; the north and south receivers; MND tank; the north and south weigh tanks; the north and south wash tanks; the north and south strippers; the north and south crude storage tanks; the north and south stills; the recovered DPA tank; the north and south tars; the gel churn; the north and south vent tanks; the effluent tank, the hold tanks; and the jets which are vented to the flare; and the associated piping (i.e., connectors, flanges, pumps, etc.).
- b. The flare shall be designed for and operated with no visible emissions as determined by USEPA Method 22 of 40 CFR Part 60, Appendix A, except for periods not to exceed a total of five minutes during any one hundred twenty consecutive minutes.
- c. The flare shall be operated with a pilot flame. The flame shall be present at all times and shall be monitored with a thermocouple or any other equivalent device to detect the presence of the pilot flame.
- d. The flare shall be nonassisted.
- e. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be two hundred Btu/scf or greater.
- f. Except as provided in b)(2)g. below, the flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than sixty feet per second.
- g. Excluded from the requirements of b)(2)f. above is any nonassisted flare that meets both of the following requirements:
 - i. The net heating value of the gas being combusted in the flare, as determined by the method specified in paragraph (P)(2) of rule 3745-21-10 of the Administrative Code, shall be greater than one thousand Btu/scf.



- ii. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in paragraph (P)(3) of rule 3745-21-10 of the Administrative Code, less than four hundred feet per second.
- h. The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design.
- i. The flare shall be operated at all times when emissions may be vented to it.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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

- (2) The permittee shall record the following information each day for the flare and the process operations:
 - a. all periods during which there was no pilot flame; and
 - b. the operating times for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(4)(b)(i) & (x), and OAC rule 3745-77-07(C)(1)]

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

<u>Section/Table:</u>	<u>Requirement:</u>
63.2485(a)	You must meet each requirement in Table 7 to this subpart that applies to your wastewater streams and liquid streams in open systems within an MCPU, except as specified in paragraphs (b) through (o) of this section.
Table 7	You must meet each requirement in Table 7 that applies to your wastewater streams and liquid streams in open systems within an MCPU.
63.2480(a)	You must meet each requirement in Table 6 to this subpart that applies to your equipment leaks, except as specified in



paragraphs (b) through (d) of this section.

Table 6	You must meet each requirement in Table 6 that applies to your equipment leaks.
63.2490(a)	You must comply with each requirement in Table 10 to this subpart that applies to your heat exchange systems, except as specified in paragraphs (b) and (c) of this section.
Table 10	You must meet each requirement in Table 10 that applies to your heat exchange systems.
63.2525	You must keep the records specified in paragraphs (a) through (k) of this section.
63.2525(a)	Each applicable record required by Subpart A of 40 CFR Part 63 and in referenced Subparts F, G, SS, UU, WW, and GGG of 40 CFR Part 63 and in referenced Subpart F of 40 CFR part 65.
63.2525(e)	The information specified in paragraph (e)(2), (3), or (4) of this section, as applicable, for each process with Group 2 batch process vents or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. No records are required for situations described in paragraph (e)(1) of this section.
63.2525(f)	A record of each time a safety device is opened to avoid unsafe conditions in accordance with §63.2450(s).

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit; and
 - b. identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.

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

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(4)(c), and OAC rule 3745-77-07(C)(1)]

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



<u>Section/Table:</u>	<u>Requirement:</u>
63.2515(a)	You must submit all of the notifications in §§63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified.
63.2515(b)	You must submit an initial notification not later than 120 calendar days after November 10, 2003.
63.2520(a)	You must submit each report in Table 11 to this subpart that applies to you.
63.2520(b)	You must submit each report by the date in Table 11 to this subpart and according to paragraphs (b)(1) through (5) of this section.
63.2520(d)	You must submit a notification of compliance status report according to the schedule in paragraph (d)(1) of this section, and the notification of compliance status report must contain the information specified in paragraph (d)(2) of this section.
63.2520(e)	The compliance report must contain the information specified in paragraphs (e)(1) through (10) of this section.
Table 11	You must submit each report that applies to you on the schedule shown in Table 11.

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

[Authority of Term: OAC rule 3745-15-03(A)]

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:

For the diphenylamine-based antioxidants process, the VOC emissions from the reactor process vent streams, except the emulsion recovery system tank vent, recovered MND tank vent, and process emergency safety relief devices, shall be vented to a control device that is designed and operated to achieve a control efficiency of at least ninety-five per cent, by weight.

Applicable Compliance Method:

Compliance with the allowable VOC control efficiency shall be assumed based upon the October 30, 2008 flare compliance assessment that demonstrated



compliance with the net heating value for the gas being combusted and the maximum permitted exit velocity.

[Authority for term: OAC rule 3745-31-5(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

2.0 pounds of VOC per hour for fugitive and stack emissions

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be determined by multiplying the maximum amount of VOC vented from this emissions unit to the flare by (1-0.98*) for stack emissions plus the VOC emission rate, in pounds per hour, determined from EPA-453/R-95-017 "Protocol for Equipment Leak Emission Estimates" for fugitive emissions.

*The control efficiency of the flare is assumed to be 98%.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

8.8 tons of VOC per year for stack and fugitive emissions

Applicable Compliance Method:

The annual allowable VOC emission limitation above was determined by multiplying the hourly allowable VOC emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

No visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



11. P020, RLP

Operations, Property and/or Equipment Description:

RLP - Reactive Liquid Polymers - reactors, processing vessels, product purification, finishing, and raw material recovery

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 16-395)	117.94 tons of volatile organic compounds (VOC) per year The overall control efficiency shall exceed 85 percent by weight for VOC.
b.	40 CFR Part 63, Subpart U [In accordance with 40 CFR 63.480(a)(2), this emissions unit is an existing elastomer product process unit subject to the emissions limitations/ control measures specified in this section.]	For each aggregate batch vent stream, reduce organic HAP emissions by 90 weight percent or to a concentration of 20 ppm _v , whichever is less stringent, on a continuous basis using a control device. For purposes of complying with the 20 ppm _v outlet concentration standard, the outlet concentration shall be calculated on a dry basis. When a combustion device is used for purposes of complying with the 20 ppm _v outlet concentration standard, the concentration shall be corrected to 3 percent oxygen if supplemental combustion air is used to combust the emissions. If supplemental combustion air is not used, a correction to 3 percent oxygen is not required. [Authority for term: 40 CFR 63.487(b)(2)]
c.	40 CFR Part 63, Subpart A	Table 1 to Subpart U of Part 63 - Applicability of General Provisions to Subpart U shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subparts F, G, & H	Table 2 to Subpart U of Part 63 - Applicability of Subparts F, G, & H of Part 63 shows which parts of these Subparts are applicable.

(2) Additional Terms and Conditions

- a. The following unit operations emit OC: the RM charging system, the CTBN reactors, the blowdown tanks, the wet rubber storage tanks, the dryer system, the drumming station, the monomer and solvent recovery systems, the AEP storage tank, the post RXN & blending system, and the vent collection tanks which are controlled with a thermal oxidizer and/or condenser and the roof vent tank and the associated piping (i.e., connectors, flanges, pumps, etc.).
- b. The permittee shall comply with the applicable emission standards and provisions required under 40 CFR Part 63, Subpart U, including the following sections:

Section: Requirement:

63.483(a) At all times, each owner or operator must operate and maintain any affected source subject to the requirements of 40 CFR Part 63, Subpart U, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Except as allowed under paragraphs (b) through (d) of this section, the owner or operator of an existing or new affected source shall comply with the provisions in:

- (1) Section 63.484 for storage vessels;
- (2) Sections 63.486 through 63.492 for batch front-end process vents;
- (3) Section 63.501 for wastewater;
- (4) Section 63.502 for equipment leaks;
- (5) Section 63.504 for additional test methods and procedures;
- (6) Section 63.505 for monitoring levels and excursions; and
- (7) Section 63.506 for general reporting and recordkeeping requirements.



63.484(a) This section applies to each storage vessel that is assigned to an affected source, as determined by §63.480(g). Except for those storage vessels exempted by paragraph (b) of this section, the owner or operator of affected sources shall comply with the requirements of §§63.119 through 63.123 and 63.148, with the differences noted in paragraphs (c) through (s) of §63.484, for the purposes of 40 CFR Part 63, Subpart U.

63.486(b) Aggregate batch vent streams, as defined in §63.482, are subject to the control requirements specified in §63.487(b), as well as the monitoring, testing, recordkeeping, and reporting requirements specified in §§63.489 through 63.492 for aggregate batch vent streams.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart U, including the following sections and table:

Section/Table: Requirement:

63.487(d) If a boiler or process heater is used to comply with the percent reduction requirement specified in paragraph (a)(2) or (b)(2) of this section, the batch front-end process vent or aggregate batch vent stream shall be introduced into the flame zone of such a device.

Table 7 Minimum Firebox Temperature

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable value for the daily average temperature in the firebox of the new thermal oxidizer shall not be below 1566 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance when emissions unit P020 is in operation and venting emissions to the new thermal oxidizer.

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable value for the daily average temperature in the firebox of the old thermal oxidizer shall not be below 1476 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance when emissions unit P020 is in operation and venting emissions to the old thermal oxidizer.

(3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature in the firebox of the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the

desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. the daily average temperature in the firebox of the new thermal oxidizer when emissions unit P020 is in operation and venting to the new thermal oxidizer;
- b. the daily average temperature in the firebox of the old thermal oxidizer when emissions unit P020 is in operation and venting to the old thermal oxidizer; and
- c. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.

If all recorded values of the temperature in the firebox are above the minimum established temperature in d)(1) or d)(2) above, the permittee may record that all values were above the minimum temperature rather than calculating and recording the daily average temperature for that operating day.

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

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;



- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature 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.

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

- (5) The permittee shall collect and record the following information for this emissions unit each month:
 - a. the amount of volatile organic material charged, in pounds or ton(s);
 - b. the amount of volatile organic material converted to product, in pounds or ton(s);
 - c. the amount of volatile organic material recovered, in pounds or ton(s);
 - d. the amount of volatile organic material converted to waste, in pounds or ton(s);
 - e. the amount of volatile organic material sent to the oxidizer (i.e., d)(5)a. minus d)(5)b. minus d)(5)c. minus d)(5)d. minus d)(5)f. minus d)(5)g.), in pounds or ton(s);
 - f. the fugitive VOC emissions, in pounds or ton(s);
 - g. hose VOC emissions, in pounds or ton(s);
 - h. the amount of volatile organic compounds emitted from the thermal oxidizer (i.e., d)(4)e. times (1- the destruction efficiency)) , in pounds or ton(s); and
 - i. the total VOC emission rate (i.e., d)(5)f. plus d)(5)g. plus d)(5)h.), in pounds or ton(s).

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

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

<u>Section/Table:</u>	<u>Requirement:</u>
63.488(a)	Except as provided in paragraph (a)(3) of this section, the owner or operator of batch front-end process vents at affected sources shall determine the group status of each batch front-end process vent in accordance with the provisions of this section. This determination may be based on either organic HAP or TOC emissions.
63.489(a)	Each owner or operator of a batch front-end process vent or aggregate batch vent stream that uses a control device to comply with the requirements in §63.487(a)(2) or §63.487(b)(2) shall install the monitoring equipment specified in paragraph (b) of this section. All monitoring equipment shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.
63.489(b)(3)	Where a boiler or process heater of less than 44 megawatts design heat input capacity is used, a temperature monitoring device in the firebox equipped with a continuous recorder is required.
63.489(e)	Parameter monitoring levels for batch front-end process vents and aggregate batch vent streams shall be established as specified in paragraphs (e)(1) through (e)(3) of this section.
63.489(e)(1)	For each parameter monitored under paragraph (b) or (c) of this section, the owner or operator shall establish a level, defined as either a maximum or minimum operating parameter as denoted in Table 7 of 40 CFR Part 63, Subpart U, that indicates proper operation of the control device. The level shall be established in accordance with the procedures specified in §63.505.
63.489(e)(2)	The established level, along with supporting documentation, shall be submitted in the Notification of Compliance Status or the operating permit application as required in §63.506(e)(5) or §63.506(e)(8), respectively.
63.489(e)(3)	The operating day shall be defined as part of establishing the parameter monitoring level and shall be submitted with the information in paragraph (e)(2) of this section. The definition of operating day shall specify the time(s) at which an operating day begins and ends. The operating day shall not exceed 24 hours.
63.491(a)	Except as provided in paragraphs (a)(7) and (a)(8) of this section, each owner or operator of an affected source shall maintain the records specified in paragraphs (a)(1) through (a)(6) of this section for each batch front-end process vent subject to the group determination procedures of §63.488.

- 63.491(b)(4)(ii) For a boiler or process heater, a description of the location at which the vent stream is introduced into the boiler or process heater.
- 63.491(b)(4)(iii) For a boiler or process heater with a design heat input capacity of less than 44 megawatts and where the process vent stream is introduced with combustion air or is used as a secondary fuel and is not mixed with the primary fuel, the percent reduction of organic HAP or TOC achieved, as determined using the procedures specified in §63.490(c) for batch front-end process vents and §63.490(e) for aggregate batch vent streams.
- 63.491(c) For each parameter monitored according to §63.489(b) and Table 6 of 40 CFR Part 63, Subpart U, maintain documentation showing the establishment of the level that indicates proper operation of the control device as required by §63.489(e) for parameters specified in §63.489(b). This documentation shall include the parameter monitoring data used to establish the level.
- Table 6 Group 1 Batch Front-End Process Vents and Aggregate Batch Vent Streams - Monitoring, Recordkeeping, and Reporting Requirements
- 63.491(f)(1) Continuous records of the equipment operating parameters specified to be monitored under §63.489(b) and listed in Table 6 of 40 CFR Part 63, Subpart U, as applicable.
- 63.491(f)(2) Records of the daily average value of each continuously monitored parameter for each operating day determined according to the procedures specified in §63.506(d).
- 63.501(a) Except as specified in paragraph (c) of this section, the owner or operator of each affected source shall comply with the requirements of §§63.132 through 63.147 for each process wastewater stream originating at an affected source, with the requirements of §63.148 for leak inspection provisions, and with the requirements of §63.149 for equipment that is subject to §63.149, with the differences noted in paragraphs (a)(1) through (a)(23) of this section. Further, the owner or operator of each affected source shall comply with the requirements of §63.105(a) for maintenance wastewater, as specified in paragraph (b) of this section.
- 63.502(a) The owner or operator of each affected source, shall comply with the requirements of Subpart H of 40 CFR Part 63, with the exceptions noted in paragraphs (b) through (m) of this section. Surge control vessels required to be controlled by Subpart H may, alternatively, comply with the Group 1 storage vessel provisions specified in §63.484.
- 63.502(n) The owner or operator of each affected source shall comply with the requirements of §63.104 for heat exchange systems, with the

exceptions noted in paragraphs (n)(1) through (n)(5) of this section.

- 63.505(b) In cases where a performance test is required by 40 CFR Part 63, Subpart U, or the owner or operator of the affected source elects to do a performance test in accordance with the provisions of 40 CFR Part 63, Subpart U, and an owner or operator elects to establish a parameter monitoring level for a control, recovery, or recapture device based exclusively on parameter values measured during the performance test, the owner or operator of the affected source shall comply with the procedures in paragraphs (b)(1) through (b)(4) of this section, as applicable.
- 63.505(b)(2) During initial compliance testing, the appropriate parameter shall be continuously monitored during the required 1-hour runs. The monitoring level(s) shall then be established as the average of the maximum (or minimum) point values from the three test runs. The average of the maximum values shall be used when establishing a maximum level, and the average of the minimum values shall be used when establishing a minimum level.
- 63.505(b)(4) For aggregate batch vent streams, the monitoring level shall be established in accordance with paragraph (b)(2) of this section.
- 63.505(g) With respect to storage vessels (where the applicable monitoring plan specifies continuous monitoring), aggregate batch vent streams and process wastewater streams, an excursion means any of the three cases listed in paragraphs (g)(1)(i) through (g)(1)(iii) of this section.
- 63.505(g)(1)(iv) Monitoring data are insufficient to constitute a valid hour of data, as used in paragraphs (g)(1)(ii) and (g)(1)(iii) of this section, if measured values are unavailable for any of the 15-minute periods within the hour. For data compression systems approved under §63.506(g)(3), monitoring data are insufficient to calculate a valid hour of data if there are less than four data measurements made during the hour.
- 63.505(g)(1)(v) The periods listed in paragraphs (g)(1)(v)(A) through (g)(1)(v)(E) of this section are not considered to be part of the period of control or recovery device operation, for the purposes of paragraphs (g)(1)(ii) and (g)(1)(iii) of this section.
- 63.505(h) A number of excused excursions shall be allowed for each control or recovery device for each semiannual period. The number of excused excursions for each semiannual period is specified in paragraphs (i)(1) through (i)(6) of this section. This paragraph applies to affected sources required to submit Periodic Reports semiannually or quarterly. The first semiannual period is the 6-month period starting the date the Notification of Compliance Status is due.
- 63.506(a) Unless otherwise specified in 40 CFR Part 63, Subpart U, the owner or operator of an affected source shall keep copies of all applicable

records and reports required by 40 CFR Part 63, Subpart U for at least 5 years, as specified in paragraph (a)(1) of this section, with the exception listed in paragraph (a)(2) of this section.

63.506(b) The owner or operator of an affected source shall comply with the applicable recordkeeping and reporting requirements in 40 CFR Part 63, Subpart A as specified in Table 1 of 40 CFR Part 63, Subpart U. These requirements include, but are not limited to, the requirements specified in paragraphs (b)(1) and (b)(2) of this section.

63.506(d) Owners or operators required to keep continuous records shall keep records as specified in paragraphs (d)(1) through (d)(7) of this section, unless an alternative recordkeeping system has been requested and approved as specified in paragraph (g) of this section, and except as provided in paragraph (h) of this section.

e) Reporting Requirements

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

- a. all the days which the daily average temperature in the firebox of the new thermal oxidizer when emissions unit P020 is in operation and venting to the new thermal oxidizer did not comply with the temperature limitation specified above;
- b. all the days which the daily average temperature in the firebox of the old thermal oxidizer when emissions unit P020 is in operation and venting to the old thermal oxidizer did not comply with the temperature limitation specified above;
- c. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to either thermal oxidizer;
- d. each incident of deviation described in “a”, “b” or “c” (above) where a prompt investigation was not conducted;
- e. each incident of deviation described in “a”, “b” or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable limit, was determined to be necessary and was not taken; and
- f. each incident of deviation described in “a”, “b” or “c” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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



- (2) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall include the calculations of the total VOC emissions and shall be submitted by January 31 of each year.

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

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

Section/Table: Requirement:

63.492(a) The owner or operator of a batch front-end process vent or aggregate batch vent stream at an affected source shall submit the information specified in paragraphs (a)(1) through (a)(6) of this section, as appropriate, as part of the Notification of Compliance Status specified in §63.506(e)(5).

63.492(b) Whenever a process change, as defined in §63.488(i)(1), is made that causes a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent, the owner or operator shall notify the Administrator and submit a description of the process change within 180 days after the process change is made or with the next Periodic Report, whichever is later. The owner or operator of an affected source shall comply with the Group 1 batch front-end process vent provisions in §§63.486 through 63.492 in accordance with §63.480(i)(2)(ii).

63.506(b)(1)(ii) For the purposes of 40 CFR Part 63, Subpart U, the semiannual start-up, shutdown, and malfunction reports shall be submitted on the same schedule as the Periodic Reports required under paragraph (e)(6) of this section instead of the schedule specified in §63.10(d)(5)(i). The reports shall include the information specified in §63.10(d)(5)(i).

63.506(e)(1) Owners and operators shall not be in violation of the reporting requirements of 40 CFR Part 63, Subpart U for failing to submit information required to be included in a specified report if the owner or operator meets the requirements in paragraphs (e)(1)(i) through (e)(1)(iii) of this section. Examples of circumstances where this paragraph may apply include information related to newly-added equipment or emission points, changes in the process, changes in equipment required or utilized for compliance with the requirements of 40 CFR Part 63, Subpart U, or changes in methods or equipment for monitoring, recordkeeping, or reporting.

63.506(e)(2) All reports required under 40 CFR Part 63, Subpart U shall be sent to the Administrator at the appropriate address listed in §63.13. If acceptable to both the Administrator and the owner or operator of a source, reports may be submitted on electronic media.

- 63.506(e)(5) For existing and new affected sources, a Notification of Compliance Status shall be submitted. For equipment leaks subject to §63.502, the owner or operator shall submit the information required in §63.182(c) in the Notification of Compliance Status within 150 days after the first applicable compliance date for equipment leaks in the affected source, and an update shall be provided in the first Periodic Report that is due at least 150 days after each subsequent applicable compliance date for equipment leaks in the affected source. For all other emission points, including heat exchange systems, the Notification of Compliance Status shall contain the information listed in paragraphs (e)(5)(i) through (e)(5)(xii) of this section, as applicable, and shall be submitted no later than 150 days after the compliance dates specified in 40 CFR Part 63, Subpart U.
- 63.506(e)(6) For existing and new affected sources, the owner or operator shall submit Periodic Reports as specified in paragraphs (e)(6)(i) through (e)(6)(xii) of this section. In addition, for equipment leaks subject to §63.502, the owner or operator shall submit the information specified in §63.182(d) under the conditions listed in §63.182(d), and for heat exchange systems subject to §63.502(n), the owner or operator shall submit the information specified in §63.104(f)(2) as part of the Periodic Report required by this paragraph (e)(6). Section §63.505 shall govern the use of monitoring data to determine compliance for Group 1 emission points.
- 63.506(e)(7) Other reports shall be submitted as specified in paragraphs (e)(7)(i) through (e)(7)(v) of this section.
- 63.506(i)(1) As of January 1, 2012, and within 60 days after the date of completing each performance test, as defined in §63.2 and as required in 40 CFR Part 63, Subpart U, you must submit performance test data, except opacity data, electronically to EPA's Central Data Exchange by using the Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/ert_tool.html/) or other compatible electronic spreadsheet. Only data collected using test methods compatible with ERT are subject to this requirement to be submitted electronically into EPA's WebFIRE database.
- 63.506(i)(2) All reports required by 40 CFR Part 63, Subpart U not subject to the requirements in paragraphs (i)(1) of this section must be sent to the Administrator at the appropriate address listed in §63.13. If acceptable to both the Administrator and the owner or operator of a source, these reports may be submitted on electronic media. The Administrator retains the right to require submittal of reports subject to paragraph (i)(1) of this section in paper format.
- Table 6 Group 1 Batch Front-End Process Vents and Aggregate Batch Vent Streams - Monitoring, Recordkeeping, and Reporting Requirements

Table 9 Routine Reports Required by 40 CFR Part 63, Subpart U

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

[Authority of Term: OAC rule 3745-15-03(A)]

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:

117.94 tons of VOC per year

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined by the record keeping requirements specified in d)(5) above.

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

b. Emission Limitation:

For each aggregate batch vent stream, reduce organic HAP emissions by 90 weight percent or to a concentration of 20 ppm_v, whichever is less stringent, on a continuous basis using a control device. For purposes of complying with the 20 ppm_v outlet concentration standard, the outlet concentration shall be calculated on a dry basis. When a combustion device is used for purposes of complying with the 20 ppm_v outlet concentration standard, the concentration shall be corrected to 3 percent oxygen if supplemental combustion air is used to combust the emissions. If supplemental combustion air is not used, a correction to 3 percent oxygen is not required.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable organic HAP emission limitation above shall be demonstrated based on the results of emission testing conducted in accordance sections 63.490(e) and 63.504 of 40 CFR Part 63, Subpart U.

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

c. Emission Limitation:

The overall control efficiency shall exceed 85 percent by weight for VOC.



Applicable Compliance Method:

If required, compliance with the overall control efficiency limitation for VOC above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

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

- (2) The permittee shall comply with the applicable testing requirements and procedures to determine compliance required under 40 CFR Part 63, Subpart U, including the following sections:

Section: Requirement:

63.490(e) Except as specified in paragraphs (e)(1) through (e)(3) of this section, owners or operators of aggregate batch vent streams complying with §63.487(b)(2) shall conduct a performance test using the performance testing procedures for continuous front-end process vents in §63.116(c).

63.504(a) Performance testing shall be conducted in accordance with §63.7(a)(1), (a)(3), (d), (e)(1), (e)(2), (e)(4), (g), and (h), with the exceptions specified in paragraphs (a)(1) through (a)(5) of this section and the additions specified in paragraph (b) of this section. Sections 63.484 through 63.501 also contain specific testing requirements.

63.504(b) Data shall be reduced in accordance with the EPA approved methods specified in the applicable subpart or, if other test methods are used, the data and methods shall be validated according to the protocol in Method 301, 40 CFR part 63, Appendix A.

g) Miscellaneous Requirements

- (1) None.



12. Emissions Unit Group -Storage Tanks: T041,T042,T043,T044,

EU ID	Operations, Property and/or Equipment Description
T041	12,000 gallon horizontal fixed roof storage tank - Acrylonitrile tank #60
T042	12,000 gallon horizontal fixed roof storage tank - Acrylonitrile tank #61
T043	12,000 gallon horizontal fixed roof storage tank - Styrene tank #62
T044	12,000 gallon horizontal fixed roof storage tank - Acrylonitrile tank #63

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.	40 CFR Part 63, Subpart U	Per section 63.480(g) of 40 CFR Part 63, Subpart U, these storage vessel have been assigned to emissions unit P007. These storage vessel meets the definition of a Group 2 storage vessel.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) See c) of Section C.8 for emissions unit P007.

d) Monitoring and/or Recordkeeping Requirements

(1) See d) of Section C.8 for emissions unit P007.

e) Reporting Requirements

(1) See e) of Section C.8 for emissions unit P007.

f) Testing Requirements

(1) See f) of Section C.8 for emissions unit P007.



Preliminary Proposed Title V Permit

Emerald Performance Materials, LLC

Permit Number: P0113378

Facility ID: 1677010029

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.